



## 2026 Board-Level Policy Review Schedule

Item 8

March 12, 2026

Governance, Communications and Human Resources Committee

**Report:** GCHRC:2026-13

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

**From:** Chief Corporate Services Officer

**Date:** March 3, 2026

### PURPOSE:

The purpose of this report is to provide the Governance, Communications and Human Resources Committee (“GCHRC”) with the proposed 2026 Board-Level Policy Review Schedule and the list of Board-level policies that will require review from 2027-2030, and to seek the GCHRC’s feedback on policy review prioritization.

### RECOMMENDATIONS:

It is recommended that the Governance, Communications and Human Resources Committee:

1. Receive this report for information; and
2. Provide feedback on the proposed 2026 Board-Level Policy Review schedule and the preliminary 2027-2030 Board-Level Policy Review Schedule.

### FINANCIAL IMPACT STATEMENT:

There are no financial implications related to adopting the recommendations in this report.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial implications as presented in the financial impact section.

## **REASONS FOR RECOMMENDATIONS:**

### **Role of the Board in TCHC's Policy Oversight**

As outlined in TCHC's Policy Management Framework, which was approved by the Board of Directors (the "Board") at its December 12, 2024 meeting (Report TCHC:2024-81), the Board is responsible for reviewing and approving policies that are:

- Required by legislation, bylaws, shareholder direction, or other compliance obligations;
- Address significant organizational risk (financial, legal, reputational, or operational); and/or
- Have a material impact on tenants, including vulnerable populations.

Section I of the Board Charter further describes the Board's oversight in relation to policy approval as follows:

"The Board oversees the development of a framework to permit the Board to provide oversight to:

- Monitor compliance with all significant policies and procedures of TCHC's operations;
- Direct management to ensure TCHC operates at all times within applicable laws and regulations and to the highest ethical standards;
- Provide policy direction to Management while respecting its responsibility for day-to-day management of TCHC's business; and
- Review significant new corporate policies or materials amendments to existing policies."

Board-level policies are first received by the appropriate Committee including Tenant Services Committee ("TSC"), Building Investment, Finance and Audit Committee ("BIFAC"), or GCHRC based on the policy's subject matter prior to consideration and approval by the full Board.

### **BOARD-LEVEL POLICY REVIEW SCHEDULE:**

In Q1 2026, the Strategy team facilitated an organization-wide policy prioritization exercise covering all policies (e.g. Board, corporate, and divisional), using standardized criteria aligned with TCHC's Policy Management Framework ("PMF") (see Attachment 1).

TCHC currently maintains 52 Board-Level policies. As part of ongoing validation with Policy Owners, this inventory is being assessed to confirm sequencing, identify opportunities for consolidation or retirement, and ensure alignment with legislative risk and operational priorities.

For 2026, 15 Board-level policies are recommended for review or development (see Attachment 2). Of these:

- Four are new policies to be developed; and
- 11 are existing policies to be reviewed.

Based on organizational capacity, management is recommending a cadence of approximately 10-15 Board-level policies per year as a manageable and sustainable target. This approach supports governance oversight while aligning with operational realities. While most policies only require updating, the workload and complexity may be similar to the development of new policies when a policy is years out of date.

For the majority of the proposed 2026 items, work is already underway, including drafting, consultation planning, and internal alignment where collaboration across business units is required.

The 2027-2030 list included in Attachment 2 is presented as a planning view only. In addition to input from GCHRC, input from Policy Owner workshops will also be considered.

Policies reviewed or renewed in 2025 are incorporated into the planning view to maintain sequencing continuity and provide planning visibility.

### **STRENGTHENING TCHC's POLICY MATURITY IN 2026:**

In 2026, the Strategy team will continue to focus on strengthening policy development at TCHC by exploring opportunities for organizational capacity building and more fulsome implementation of the Policy Management Framework. Areas of focus include:

- Supporting clearer understanding across the organization of policy roles, approval levels, and standards in alignment with the PMF;
- Providing training, tools and guidance to improve the quality and consistency of policy development;
- Reinforcing alignment between policy development and enterprise frameworks for risk management and compliance;

- Approaches for effective engagement of staff, tenants and other key partners; and
- Ensuring Board-approved policies are appropriately prioritized and aligned with Committee and Board oversight timelines.

**POLICY PUBLICATION AND WEBSITE UPDATES:**

Upon Board approval, policies are finalized in collaboration with the Strategy team and the responsible division. Updated versions are provided to the Communications team for posting to TCHC's public policy webpage upon implementation of the policy. At the time of posting, prior versions are removed to ensure that only current, approved policies are publicly accessible. Internal repositories are updated concurrently to maintain version control and historical records in accordance with TCHC's records management process.

**IMPLICATIONS AND RISKS:**

Timely review and development of Board-level policies is critical to maintaining compliance, mitigating organizational risk, and ensuring policies remain current and effective.

A clearly sequenced multi-year Board-Level Policy Review schedule, aligned with appropriate Committee review prior to Board consideration, supports effective governance oversight and reduces the risk of delays or ad-hoc governance decisions.

**SIGNATURE:**

*"Barbara Shulman"*

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Barbara Shulman,  
Chief Corporate Services Officer

**ATTACHMENTS:**

1. Policy Review Language from the Policy Management Framework
2. Board-Level Policies for Review (2026-2030)

**STAFF CONTACT:**

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**Attachment 1**

## **Policy Review Language from the Policy Management Framework**

### **Policy Review Schedule**

[The policy team] in 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
  - g. Need to review policy through an equity diversity and inclusion (EDI), accessibility 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.*

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**Attachment 2**

**Board-Level Policies for Review 2026-2030**

**Proposed 2026 Board-Level Policy Review Schedule**

<b>Policy</b>	<b>Division</b>	<b>New/Existing</b>	<b>Last Reviewed</b>	<b>Committee</b>	<b>Estimated Timeline</b>
Tenant Community Gardens Policy	Operations	Existing	2026-02-17	TSC	Q1 (complete)
Expense Reimbursement Policy	Finance	Existing	2013-10-24	BIFAC	Q2
Procurement Policy	Finance	Existing	2025-07-01	BIFAC	Q2
Artificial Intelligence (AI) Policy	Information Technology Services	New		BIFAC	Q2
Business Continuity Management Policy	Legal	New		BIFAC	Q2
Elections Policy	Strategic Planning & Communications	Existing	2018-06-01	GCHRC	Q2
Translation and Interpretation Policy	Strategic Planning & Communications	Existing	2005-05-01	GCHRC	Q2

<b>Policy</b>	<b>Division</b>	<b>New/Existing</b>	<b>Last Reviewed</b>	<b>Committee</b>	<b>Estimated Timeline</b>
Compliance Management Policy	Legal	New		GCHRC	Q3
Accessibility Policy	Strategic Planning & Communications	Existing	2015-07-29	GCHRC	Q4
Accessibility in the Built Environment Policy	Facilities Management	Existing	2018-02-01	BIFAC	Q4
Director Education and Board Development Policy	Board	Existing	2011-12-13	GCHRC	Q4
Risk Appetite Policy	Legal	New		BIFAC	Q4
Evictions for Cause Policy	Operations	Existing	2015-03-01	TSC	Q4
Non-Residential Use of Space Policy for Agencies	Operations	Existing	2018-09-04	TSC	Q4
Non-Residential Use of Space Policy for Tenants and Tenant-Led Groups	Operations	Existing	2018-09-04	TSC	Q4

**List of Board-Level Policies for Review 2027-2030 (Subject to Validation from GCHRC)**

<b>Policy</b>	<b>Division</b>	<b>New/Existing</b>	<b>Last Reviewed</b>
Accessible Customer Service Policy	Operations	Existing	2011-08-17
Relocation Policy	Development	Existing	2020-06-24
Fair Wage Policy	Finance	Existing	2017-01-01
Information Security Policy	Information Technology Services	Existing	2025-12-01
Conflict of Interest Policy - Employees	Legal	Existing	2016-07-06
Enterprise Risk Management Policy	Legal	Existing	2018-12-06
Fraud Prevention Policy	Legal	Existing	2018-09-27
Privacy Policy	Legal	Existing	2018-02-23
Whistleblower Policy	Legal	Existing	2018-09-27
Addition to Household Composition Directive	Operations	Existing	2011-08-11
Distribution and Allocation of the Use of Space Funds Policy	Operations	Existing	2010-01-01
Distribution of Tenant Council Funds Policy	Operations	Existing	2010-01-01

<b>Policy</b>	<b>Division</b>	<b>New/Existing</b>	<b>Last Reviewed</b>
Eviction Prevention Policy for Non-Payment of Rent (Arrears)	Operations	Existing	2014-06-06
Harm Reduction Policy	Operations	Existing	2020-09-30
Referral Agreement Policy	Operations	Existing	2020-09-25
Scholarship Policy	Operations	Existing	2015-10-29
Security Video Surveillance Policy	Operations	Existing	2024-10-18
Sponsorship Policy	Operations	Existing	2015-10-29
Visitor and Guest Policy	Operations	Existing	2019-05-19
Vulnerability Definition Policy and Vulnerability Operational Guideline	Operations	Existing	2014-12-16
Human Rights Policy (Staff)	People & Culture	Existing	2017-06-01
Use of Consultants Policy	People & Culture	Existing	2002-07-01
Workplace Diversity Policy	People & Culture	Existing	2016-06-10
Identity-Based Data Collection (Tenants Policy)	Strategic Planning & Communications	New	
Code of Ethics + Conduct - Board of Directors	Board	Existing	2025-07-18

<b>Policy</b>	<b>Division</b>	<b>New/Existing</b>	<b>Last Reviewed</b>
Debt Management Policy	Finance	New	
Code of Conduct Policy (Employees)	People & Culture	Existing	2015-12-03
Social media terms of use	Strategic Planning & Communications	Existing	2023-10-05
Compensation Philosophy	People & Culture	Existing	2024-01-01
Media and Issues Protocol	Strategic Planning & Communications	Existing	2023-02-01
Deputation Policy for Stakeholders	Board	Existing	2025-07-18
Past Tenant Debts Write-Off Policy	Finance	Existing	2025-05-01
Tenant Human Rights Policy	Legal	Existing	2025-10-17
Electric Mobility Device (E-Device) Policy	Operations	Existing	2025-10-17
Tenant Funds Distribution Policy	Operations	Existing	2025-06-25
Tenant Transfer Policy	Operations	Existing	2025-04-01

Annual Policy Review Schedule:

<b>Policy</b>	<b>Division</b>	<b>New/Existing</b>	<b>Last Reviewed</b>
Investment Policy Statement	Investment Advisory Committee	Existing	2025-04-16