Multi-Year Accessibility Plan

Toronto Community Housing is committed to meeting the accessibility needs of people with disabilities in a timely manner. To meet this goal and to comply with the requirements under Ontario Regulation 191/11 (the "Integrated Accessibility Standards") of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), Toronto Community Housing has developed the following multi-year Accessibility Plan for Integrated Accessibility Standards ("Plan"). This plan will be reviewed at least once every five years, and is available in accessible format upon request.

This Plan covers the following areas:

1. Statement of commitment; and
2. An implementation chart to track compliance with the Integrated Accessibility Standards.

Table of contents

Organizational Statement of Commitment

Toronto Community Housing is committed to providing an inclusive environment to residents and employees with disabilities in accordance with the core principles of accommodation, dignity, independence, integration and equal opportunity outlined in the Accessibility for Ontarians with Disabilities Act, 2005, the Ontario Human Rights Code 1990 and the complimentary legislation of the Integrated Accessibility Standards Regulation (Ontario Reg. 191/11) (IASR), Accessibility Standards for Customer Service (Ontario Reg. 429/07), Employment Standards Act (2000), and the Ontario Building Code (Ontario Reg. 332/12). Toronto Community Housing recognizes the need to identify and remove barriers faced by people with disabilities, and will achieve greater accessibility by aligning with a culture that recognizes the dignity and worth of every individual.

TRACKING REQUIREMENTS:

AODA Requirements	Implementation Status	Comments
3.(1)Policy Requirements Development of Accessibility Policies and Statement of Organizational Commitment Deadline: January 1, 2026	CURRENTLY COMPLIANT ▪ Accessible Customer Service Policy, Accessibility Policy and Accessible Built Environment Policy are available online and made available to the public and in an accessible format upon request.	MOVING FORWARD: ▪ These policies will be reviewed based on TCHC's internal review process that are more frequent than legislative requirements.

December 2021

AODA Requirements	Implementation Status	Comments
4. (1) Accessibility Plan Deadline: January 1, 2026	CURRENTLY COMPLIANT ▪ The 2017 Multiyear Accessibility Plan is posted on our website and in an accessible format in December 2017. ▪ This has once again been updated and placed on the website by the end of 2021.	MOVING FORWARD: ▪ This Multiyear Accessibility Plan will be made available online by December 31, 2021 in an accessible format, and reviewed every 5 years.
6. (1)Self Serve Kiosks Deadline: January 1, 2026	CURRENTLY COMPLIANT ▪ Majority of our pay and display visitor parking machines are installed in parking lots and are operated by Toronto Parking Authority. ▪ Existing Kiosks are found inlaundry rooms and small parking facilities are currently compliant. ▪ Vendors that manage facilities have to comply with accessibility standards.	MOVING FORWARD: ▪ In the process of ordering wireless debit machines for all Tenant Service Hubs as they open.

AODA Requirements	Implementation Status	Comments
7. (1) Training Training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Ontario *Human Rights Code* as it pertains to persons with disabilities. Deadline: January 1, 2026	COMPLETED ▪ Training on AODA and Human Rights Codewere provided to all staff by the end of 2014. ▪ In-person training completed with all staff in 2016 and 2017. ▪ All new employees currently receive AODA and Human RightsCode training as part of general orientation. • The Declaration of Compliance includesrequirements of AODA legislation.	MOVING FORWARD: ▪ Online training modules for AODA, Human Rights Code and Diversity will be developed and launched on the TCHC internal learning management system by Q4 2021.

AODA Requirements	Implementation Status	Comments
11. (1) Feedback Process ▪ Establish a feedback process for receiving and responding to feedback about the manner in which TCHC provides goods or services to people with disabilities, and make this process readily available to the public. Deadline: January 1, 2026	CURRENTLY COMPLIANT ▪ Tenant complaint process is used to provide feedback. Feedback can be provided by phone to the Client Care Centre, or by email from our website, or in person at a Tenant Service Hub. Issues that are unresolved or those that do not meet tenant satisfaction can be escalated to the Solutions Team via phone or website. ▪ Feedback is also gathered at tenant consultations and meetings, where accessible formats and communications supports are available upon request. ▪ Accessible feedback process and a system for receiving and responding to feedback. ▪ Divisions also have independent feedback mechanisms.	MOVING FORWARD: ▪ TCHC is revising the Tenant Complaint Policy to include further tenant recommendations by 2022.
Availability of Documents (Section 8 and 9) ▪ Notify the public in a conspicuous place on premises or on the website, that accessibility policy and feedback process is available, and provide documents in an accessible format upon request	CURRENTLY COMPLIANT ▪ Policies and feedback processes are posted online. ▪ Document request can be made to Client Care through various channels such as inbound call, voicemail, and email. ▪ Agents and Clerk work to achieve a solution by presenting resources to increase quality of living	See Comments Below.

AODA Requirements	Implementation Status	Comments

Accessibility Report (Section 11)
   ▪ File accessibility report
	CURRENTLY COMPLIANT
	   ▪ Reports filed.	

Integrated Accessibility Standards Regulation (IASR)

General Requirements

AODA Requirements	Implementation Status	Comments
Establishment of Accessibility Policies ▪ Develop, implement and maintain policies governing how the organization achieves accessibility through meeting requirements in the IASR ▪ Include a statement of organizational commitment to meet accessibility needs of persons with disabilities ▪ Document policies and make them available to the public, and provide them in an accessible format upon request	CURRENTLY COMPLIANT ▪ Accessible Customer Service Policy, Accessibility Policy and Accessible Built Environment Policy are available online and made available to the public and in an accessible format upon request.	MOVING FORWARD: ▪ These policies will be reviewed based on TCHC's internal review process that frequent than legislative requirements.

December 2021

AODA Requirements	Implementation Status	Comments
Accessibility Plans (IASR Section 4) **Implementation Date: January 1, 2013** ■ Establish, implement and maintain a multi-year accessibility plan which addresses strategies to prevent/remove barriers ■ Post multi-year plan on website ■ Review and update plan every 5 years ■ Post annual status report of progress ■ Make documents available to the public and available in an accessible format upon request	CURRENTLY COMPLIANT ■ The Multiyear Accessibility Plan is posted on our website and in an accessible format.	MOVING FORWARD: ■ This enhanced Multiyear Accessibility Plan will be made available online by December 31, 2021 in an accessible format, and reviewed every 5 years. (Next review 2026)

Information and Communications Standards

AODA Requirements	Implementation Status	Comments
Feedback (IASR Section 11) **Implementation Date:** • Ensure all feedback processes are accessible to people with disabilities, by providing or arranging for the provision of accessible formats and communication supports, upon request • Notify the public that accessible formats or communication supports are available	CURRENTLY COMPLIANT • Accessible formats and communications supports in person or by phone are available upon request at no charge. • Client Care Centre (tenant phone line) has TTY available for hearing impaired residents. It also has interpreting into 168 languages.	MOVING FORWARD: • This will be reviewed in line with the next AODA compliance report.

AODA Requirements	Implementation Status	Comments
Accessible Formats and Communication Supports (IASR Section 12) **Implementation Date: January 1, 2015** ▪ Provide or arrange for provision of accessible formats and communication supports, upon request ▪ Notify the public that accessible formats and communication supports are available ▪ Consult with the person making the request to determine the suitability of the accessible format or communication support	CURRENTLY COMPLIANT ▪ TCHC has a process to provide alternateformats via internally trained resourcesor third-party vendor services. ▪ All requests online are received by Strategic Communications and each requester is consulted with. ▪ Posters developed by Strategic Communication include a statement to notify tenants that they can request accessible formats.	MOVING FORWARD ▪ Operations Division will ensure posters are in place at buildings to inform tenants that accessible formats are available, and that accommodations are available upon request.

AODA Requirements	Implementation Status	Comments
Emergency Procedure, Plans or Public Safety Information (IASR Section 13) ▪ Provide publicly available emergency procedures, plans, or safety information in accessible formats or with communications supports, upon request	CURRENTLY COMPLIANT ▪ Risk Management provides accessible formats for TCHC emergency plans and procedures ▪ Fire Safety Plans are available in accessible formats. State of Good Repair projects have been identified and implemented to upgrade systems to include visual alarms. ▪ Fire Wardens are trained on responsibilities and able to assist the public ▪ The Tenant Self-ID process has been implemented and the vulnerability list is updated monthly by buildings and placed in fireboxes, ensuring first responders have access.	LOOKING FORWARD ▪ Working in partnership with the Toronto Fire Services, fire prevention and emergency preparedness materials and community initiatives are being developed and can be delivered in an accessible format. ▪ Scope out the communication channels to enhance tenant education initiatives on emergency preparedness and to increase the awareness of the tenant Self-ID process with staff and tenants.

AODA Requirements	Implementation Status	Comments
Accessible Website and Web Content (IASR Section 14) **Implementation Date: January 1, 2014 and January 1, 2021** - New websites published **after** January 1, 2014 must meet Web Content Accessibility Guidelines WCAG Level A - By 2021 all websites and content must meet WCAG Level AA. - Applies to websites and web content, including web-based applications that an organization controls directly or through a contractual relationship - Applies to all content published on a website after January 1, 2012 (i.e., when new website is launched the requirement applies retroactively to all	CURRENTLY COMPLIANT - TCHC completed a Web Content Migration project and launched a new website, prior to the AODA deadline was in effect. Further upgrades were made in 2018. - All photos on website contain alt-text - The current website is accessible to WCAG Level AA, with a few exceptions - Web Standards for accessible web design practices are in place. - PDFs on website will be replaced with remediated, accessible PDFs by end of 2021 into early 2022. - Code and content updates to heavy traffic pages completed by early 2022 to meet WCAG requirements	MOVING FORWARD: TCHC is working towards creating a new website that will be fully WCAG Level AA compliant. This should be completed by late 2022/early 2023.

AODA Requirements	Implementation Status	Comments
content that was published after 2012, e.g. PDFs)		

Employment Standards

AODA Requirements	Implementation Status	Comments
Recruitment General (IASR Section 22) **Implementation Date: January 1, 2014** ▪ Notify employees and public about availability of accommodation for applicants with disabilities during the recruitment process	CURRENTLY COMPLIANT ▪ Internal and external job postings include a statement that TCHC provides equitable treatment and accommodation to ensurebarrier free employment.	MOVING FORWARD ▪ This will be reviewed in line with the next AODA compliance report.
Recruitment, assessment or selection process (IASR Section 23) **Implementation Date: January 1, 2014** Notify job applicants about availability of accommodation during the recruitment	CURRENTLY COMPLIANT ▪ When inviting both internal and external candidates to attend an interview or participate in a test, they are advised that requests for accommodation are accepted throughout the hiring process.	MOVING FORWARD ▪ This will be reviewed in line with the next AODA compliance report.

AODA Requirements	Implementation Status	Comments
process, in relation to the materials or processes to be used Consult with the applicant to determine suitable accommodation that takes into account accessibility needs due to a disability	▪ TCHC reviews all requests and determinesappropriate accommodation on a case bycase basis in consultation with the individual	
Notice to Successful Applicants (IASR Section 24) **Implementation Date: January 1, 2014** When making job offers, inform the successful applicant of policies for accommodating employees with disabilities	CURRENTLY COMPLIANT ▪ All permanent and temporary employees, both union and non-union, external and internal, are notified verbally and/or in written job offers about policies and procedures for accommodating employees with disabilities.	MOVING FORWARD ▪ This will be reviewed in line with the next AODA compliance report.
Informing Employees of Supports (IASR Section 25) **Implementation Date: January 1, 2014** Inform employees of policies used to support employees with disabilities including	CURRENTLY COMPLIANT ▪ Accommodation and accessibility related policies are available to all employees on TCHC's "In House" Intranet ▪ Employees are notified in job offers about policies and procedures for	MOVING FORWARD ▪ This will be reviewed in line with the next AODA compliance report.

AODA Requirements	Implementation Status	Comments
policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability	accommodating employees with disabilities	
Accessible Formats and Communication Supports for Employees (IASR Section 26) **Implementation Date: January 1, 2014** When requested, provide employees with accessible information and communication supports for information required to perform the job, and information generally available to employees in the workplace Consult with the employee making the request to determine suitability of the format or communication support	CURRENTLY COMPLIANT ▪ TCHC provides accommodation, communication supports, and information in an accessible format, consistent with TCHC's Accommodation Policy, TCHC's Accessibility Policy, TCHC's accommodation plan and return to work process, and TCHC's obligations under the*Human Rights Code*	MOVING FORWARD ▪ This will be reviewed in line with the next AODA compliance report.

AODA Requirements	Implementation Status	Comments
Workplace Emergency Response Information (IASR Section 27) **Implementation Date: January 1, 2012** Provide individualized workplace emergency response information to employees with disabilities if the disability is such that individualized information is necessary and the employer is aware of the need for accommodation. With employee's consent, provide workplace emergency response information to the person(s) designated by the TCHC to provide assistance Provide the information required as soon as practicable after becoming aware of the need for accommodation	CURRENTLY COMPLIANT ▪ TCHC provides this information consistentwith TCHC's Accommodation Policy and TCHC's Accessibility Policy ▪ TCHC incorporates individualized workplace emergency response information into its accommodation plan and return work process	MOVING FORWARD ▪ This will be reviewed in line with the next AODA compliance report.

AODA Requirements	Implementation Status	Comments
Review the individualized workplace emergency response information, o when the employee moves to a different location in the organization o when the employee's overall accommodations needs or plans are reviewed; and o when the employer reviews its general emergency response policies		
Documented Individual Accommodation Plans (IASR Section 28) **Implementation Date: January 1, 2014** Develop and have in place a written process for development of documented individual accommodation plans (IAP) for employees with disabilities that includes:	CURRENTLY COMPLIANT ▪ The process to develop individual accommodation plans is integrated as part of TCHC's Accommodation Policy &Guidelines ▪ TCHC has a process in place for written accommodation and return to work plans, which reflects its obligations under the	MOVING FORWARD ▪ This will be reviewed in line with the next AODA compliance report.

AODA Requirements	Implementation Status	Comments
1. How staff requesting accommodation can participate in the development process of their accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the	▪ TCHC specifically incorporates individualized workplace emergency response information into its accommodation plan and return work processes ▪ Accommodation and return to work plans are reviewed as necessary and at regular intervals.	

AODA Requirements	Implementation Status	Comments
workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. 5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. ▪ If requested, include any information regarding accessible formats and		

AODA Requirements	Implementation Status	Comments
communications supports provided ■ If required, include individualized workplace emergency response information ■ Identify any other accommodation that is to be provided.		
Return to Work Process (IASR Section 29) **Implementation Date: January 1, 2014** Develop and have in place a return to work process for employees absent due to a disability who require disability-related accommodations in order to return to work The process shall outline the steps the TCHC will take to facilitate the return to work of	CURRENTLY COMPLIANT ■ TCHC has a process in place for written accommodation and return to work plans, which reflects its obligations under the AODA, TCHC's Accommodation Policy, TCHC's Disability and Absence Management Program, and the Human Rights Code ■ TCHC has written policies and proceduresregarding the accommodation Disability Management Program in place.	MOVING FORWARD ■ This will be reviewed in line with the next AODA compliance report.

AODA Requirements	Implementation Status	Comments
employees who were absent due to a disability and shall use the Individual Accommodation Plan (IASR Section 28) as part of the process	▪ Accommodation and return to work plans are reviewed as necessary and at regular intervals.	
Performance Management (IASR Section 30) **Implementation Date: January 1, 2014** Take accessibility needs and Individual Accommodation Plans into account in the performance management process	CURRENTLY COMPLIANT ▪ Accessibility needs and individual accommodation plans are taken into account in performance management in compliance with Human Rights Code and the AODA.	MOVING FORWARD ▪ This will be reviewed in line with the next AODA compliance report.
Career Development and Advancement (IASR Section 31) **Implementation Date: January 1, 2014** Take accessibility needs and Individual Accommodation Plans into account when	CURRENTLY COMPLIANT ▪ Accessibility needs and individual accommodation plans are taken into account in performance management in compliance with the Human Rights Code and the AODA.	MOVING FORWARD ▪ This will be reviewed in line with the next AODA compliance report.

AODA Requirements	Implementation Status	Comments
providing career development and advancement to employees with disabilities ("Career development and enhancement" includes providing additional responsibilities in a current position and the movement of an employee from one job to another that may be higher pay, provide greater responsibility, or be at a higher level in the organization, and is usually based on merit or seniority)		
Redeployment (IASR Section 32) **Implementation Date: January 1, 2014** Take accessibility needs and Individual Accommodation Plans into account when redeploying employees with disabilities	CURRENTLY COMPLIANT ▪ Accessibility needs and individual accommodation plans are taken into account in performance management in compliance with the Human Rights Code and the AODA.	MOVING FORWARD ▪ This will be reviewed in line with the next AODA compliance report.

Design of Public Spaces Standards

AODA Requirements	Implementation Status	Comments
Design of Public Spaces Standards **Implementation Date: January 1, 2016** TCHC will meet the Accessibility Standards for the Design of Public Spaces when building ormaking major modifications to public spaces that are newly constructed or redeveloped by January 1, 2017.	CURRENTLY COMPLIANT ▪ Approved by the Board of Directors in December 2015, TCHC's Build Standards have provided an effective framework for the implementation of accessible design principles in both new construction and renovation projects throughout the TCHC portfolio. ▪ The Build Standards provide guidance for a wide range of applications including accessible unit modifications, common area renovations and exterior landscaping and grounds improvements. ▪ As many aspects of our standards exceed current building codes and municipal standards, Toronto Community Housing is proud to be industry leaders and innovators in accessibility.	MOVING FORWARD ▪ These standards are truly a living document. They are constantly evolving, being added to and refined to reflect the needs of TCHC tenants. Their ongoing development is the result of continuing research, healthy debate and the applying of the many lessons learned from the tenants we serve and the projects we deliver. Importantly, this document is born directly from the unique and successful collaboration between the tenant-led, volunteer-based R-PATH committee and our dedicated TCHC staff. ▪ These standards continue to be revised on an annual basis, continue to represent a collaboration with R-PATH, and continue to exceed local codes and requirements.

Accessibility Plan

AODA Requirements	Implementation Status	Comments
Accessibility Plan (IASR, Subsection 80(44)) **Implementation Date: ongoing** Ensure that TCHC's multi-year accessibility plan includes: (1) procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under Part IV.1 of the AODA; and (2) procedures for dealing with temporary disruptions when accessible elements required under Part IV.1 are not in working order.	CURRENTLY COMPLIANT Procedures for preventative and emergency maintenance of the accessible elements and for dealing with temporary disruptions when accessible elements are not in working order include: - conducting regular inspections for accessible and life safety equipment in all buildings throughout the year; - providing tenants 24/7 access to TCHC's Client Care Centre to have their needs addressed during planned and temporary service disruptions (dispatching staff for repair or direct tenant support); - notifying tenants during extended service disruptions and providing direct support, including providing all impacted individuals with reasonable alternative solutions where necessary; and - dispatching emergency maintenance services immediately when notified of a service disruption.	MOVING FORWARD This will be reviewed in line with the next AODA compliance report.

Compliance Reporting

AODA Requirements	Implementation Status	Comments
Reporting compliance in accordance with IASR Section 86.1 begins in 2014 and is required every three years thereafter until 2023.	CURRENTLY COMPLIANT ▪ Reports filed in 2014, 2017 and 2021.	MOVING FORWARD ▪ Report to be filed in 2023.