



2024 Review Schedule for Policies Requiring Board Approval

Item 8

March 26, 2024

Governance, Communications and Human Resources Committee

Report: GCHRC:2024-09

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

From: Acting Vice President, Strategic Planning and Communications

Date: February 12, 2024

PURPOSE:

The purpose of this report is to provide the GCHRC with an update on the refresh of TCHC’s Policy Management Framework and to provide the schedule of Board-level policies that will be reviewed in 2024.

RECOMMENDATIONS:

It is recommended that GCHRC receive this report for information.

REASONS FOR RECOMMENDATIONS:

Criteria for Determining Policy Approval Level

As outlined in the Policy Management Framework (Attachment 1), the Board (and relevant Board Committee) will be asked to review and approve policies that meet one or more of the following criteria:

1. Be stipulated by legislation, by-laws, the shareholder direction or other such framework or compliance requirements;
2. Address a major risk area (financial, reputational, etc.); or
3. Have significant impact on many tenant households or on vulnerable tenants.

Policies not meeting one of these criteria will be approved at a corporate level by the Executive Leadership Team, or divisional level by the Divisional Vice President, and may be reported to relevant Committees and/or to the Board for information at the discretion of the policy owner and the President and CEO, and in consultation with the GCHRC Chair.

2024 Policy Review Schedule

As reported to GCHRC at its April 11, 2023 meeting in [Report GCHRC:2023-16](#), TCHC is undertaking a refresh of the Policy Management Framework, the associated policy review and development process, and its inventory of policies.

As part of the policy inventory review process, key priority policies have been selected for review in 2024. All policies requiring Board-level approval are listed in Attachment 2. 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.

The policies identified in Attachment 2 represent a significant scope of work. Staff will continue to monitor and assess the need for new policy development and/or additional policy reviews based on legislated changes, shareholder direction, and evolving corporate and tenant needs.

Policy Management Refresh Update

In 2023, staff initiated a refresh of the Policy Management Framework 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.

The completion on the refresh work is targeted for late Q2 2024 and will be brought to GCHRC for information.

Below is an update on the work items:

Item #	Timeline	Progress Update
1. By Q4 2023, identify a set of recommended policies for priority review in 2024.	<ul style="list-style-type: none"> • Q1 2024 	<ul style="list-style-type: none"> • Complete: Attachment 2 provides the list of policies for review in 2024 and new policies.
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	<ul style="list-style-type: none"> • Q1 2024 • Q2 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.	<ul style="list-style-type: none"> • Q2 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 procedure templates, as well as looking for opportunities to add new templates for staff use (i.e. toolkits, guides, etc.).	<ul style="list-style-type: none"> • Q2 2024 	<ul style="list-style-type: none"> • In progress: A SWOT analysis of the current framework and a review of best practices for managing policies is underway.

Item #	Timeline	Progress Update
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.	<ul style="list-style-type: none"> • 2024 	<ul style="list-style-type: none"> • Ongoing: Board level policies for review have been identified for 2024 and are underway.

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

ATTACHMENTS:

1. Policy Management Framework
2. 2024 Policy Review Schedule

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Policy Management Framework

Introduction

Policies provide strategic guidance for managers and staff at all levels of the organization. The Policy Management Framework governs all Policies and Procedures for Toronto Community Housing. This Framework supports a consistent approach to policy management across the corporation by:

- Explaining the triggers for the development of new Policies or the review of current Policies;
- Mandating regular reviews to ensure Policies are current;
- Outlining the roles and responsibilities of all divisions involved in Policy review;
- Explaining the standards and expectations for Policy review, implementation and communication procedures; and
- Explaining how the Policy Management process is centrally administered.

Definitions and Criteria

Policy is a clear and high-level statement of intent and helps guide decisions and actions to achieve a desired outcome – it is the “what”. 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 generally support a particular Policy, though in some cases they may stand alone. Procedures are needed to:

- Provide an overview of specific actions, steps, or instructions that staff have to 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.

Procedures may be accompanied by **forms and templates** that are tracked and reviewed along with the associated Procedure.

Standard operating procedures (SOPs) provide step-by-step details of how to carry out a particular task. They are operational and granular in detail, and are used to ensure staff have a clear understanding of what is involved in the tasks associated with their role. SOPs often stand alone, but may also accompany a Policy or Procedure. The development of SOPs is owned by the Service Integration & Delivery unit.

Policy Types and Approval Levels

Policy Type: **Board Policy**

Approval Level: **Board of Directors**

Criteria:

1. Stipulated by legislation, by-laws, the Shareholder Direction or other such framework or compliance requirements;
2. Address a major risk area (financial, reputational, etc.);
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 risk, interest or urgency to the corporation.

Board Policies require the approval of the divisional executive, the Officers of the Corporation (“Officers”), and the appropriate Board committee in addition to the Board of Directors. Associated Procedures do not require Board approval though may be attached for information when the Policy is brought forward for approval.

All Policies brought forward for approval must be accompanied by a briefing note that outlines relevant background/context, major changes proposed, anticipated impact, and significant resources required.

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 Vice President of Human Resources, 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: Officers of the Corporation

Criteria:

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 the Officers. Associated Procedures may be attached for information although Officers approval is not required.

All Policies brought forward for approval must include a briefing note as described in the Board section (above).

Policy Type: Divisional Policy
Approval Level: Divisional Executive(s)

Criteria:

1. Operational and transactional business affecting a single division.

Divisional Policies and the associated Procedures require the approval of the divisional executive. When a new divisional Policy for Toronto Community Housing is introduced, or there are very significant changes to current direction, the Officers must be briefed on the change. Strategic Planning and Stakeholder Relations (SPSR) must also be informed to ensure all changes are centrally tracked.

Divisional executives are authorized to approve minor updates and changes to Policies outside of the regular Policy review process (as per process in "Minor Updates" described herein).

Summary of Policy Types and Approval Levels			
Policy Type	Divisional executive	Officers	Board*
Board Policy	A	A	A
Board Policy - Procedures	A	A	I
Corporate Policy	A	A	
Corporate Policy – Procedures	A	I	
Divisional Policy	A		
Divisional Policy - new/major changes	A	I	
Divisional Policy – Procedures	A		
All Policies/Procedures: minor updates	A		

A = for approval

I = for information

* “Board” approval includes the relevant board committee

Tenant Consultations

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; the Policy Owner, Resident and Community Services (RCS), and SPSR must jointly decide the most appropriate method(s) to use. SPSR and RCS will support the Policy Owner in the planning and delivery of the consultations to aid in obtaining a representative sample of the tenant population.

Timelines

Policy Reviews

A standard timeline for the review of a Board Policy would be an average of six months from initiation of the review to Board approval. A standard timeline for the review of a corporate Policy would be an average of four months from initiation of the review to Officers approval.

Timelines may be longer or shorter depending on the complexity of the Policy revision, the nature of stakeholder and tenant consultations, and the level of approval required. Policies requiring tenant consultations or Joint Health & Safety Committee review will have longer timelines.

Policy Owners must consult with SPSR when initiating a review of an existing Policy. Timelines will be established jointly at the outset of each Policy review by the Policy Owner and SPSR according to the review schedule.

Note: SPSR, in consultation with Policy Owners, generates an annual Policy review schedule, which determines the Policies that will be reviewed across the organization. If a Policy is not included on the schedule, but a Policy Owner identifies a need for a Policy’s review or development, they must provide the business rationale to add it to the schedule.

New Policies

Before a new Policy can be introduced, Policy Owners must provide SPSR with the business rationale for the new Policy based on the criteria outlined in the “Policy Development and Review Triggers” section below, and in consultation with the CEO as required.

A standard timeline for the development of a new Board or corporate Policy would often be longer than the averages listed above. Longer research, drafting and consultation phases are needed for new Policies.

Policy Owners must consult with SPSR when initiating the development of a new Policy in order to get support on work plans, timelines and compliance with the Policy Framework.

Sample Timeline		
Divisional, Corporate and Board Policies	Drafting and consultations (internal and external)	1 week–6 months
	Legal and SPSR review	1-8 weeks
Corporate and Board Policies	Due to Officers	1 week before Officers meeting
	Officers review meeting	
	Due to Board committee	20 days before committee meeting
	Board committee review	
	Due to Board	10 days before Board meeting (may be

		somewhat concurrent w/ above)
	Board review	
Divisional, Corporate and Board Policies	Implementation	1-2 months+

Approvals Process

All Policies must be reviewed by SPSR and approved by the appropriate divisional executive, and all Board and corporate Policies must be reviewed and approved by the Officers.

The Officers meet on a monthly basis and Policy reviews are a standing item on the agenda. To have a Policy reviewed and approved at an Officers' meeting, Policy Owners must have already gone through the approvals process set out in this Framework and submit their Policy to the Manager, Strategic Planning at least one week in advance of the Officers' meeting. Policies that are not submitted through the Manager, Strategic Planning will not be reviewed by the Officers.

In cases of urgency, a Policy may need to be reviewed outside of the regular Officers' meeting schedule. When this occurs, the Policy Owner must still have already gone through the approvals process set out in this Framework, and then submit their Policy to the Manager, Strategic Planning. The Manager, Strategic Planning will then distribute the Policy to the Officers via email for review and approval.

Roles

Strategic Planning & Stakeholder Relations is the owner of the Policy Management Framework, and is responsible for:

- Acting as a resource to staff for all Policy-related inquiries;
- Scheduling and managing Board and corporate Policy reviews, facilitating approvals, and monitoring divisional Policy reviews;
- Providing direction and support to Policy Owners, including ensuring that all necessary divisions are involved in the process, and that implementation and communications plans are in place;

- Ensuring Policy development and reviews 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;
- Leading the Policy development process when there is no clear Policy Owner;
- Administration related to the Framework; and
- Managing the review schedule and sharing with the Officers and Board annually.

Policy Owner is the individual from the lead division responsible for working 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.

For Board and Corporate Policies:

- **Legal Services** reviews each Policy for risk and compliance issues;
- **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.

For Divisional Policies:

- Policy Owners are required to consult with Legal Services, Strategic Communications and L&OD, as required, regarding implementation of the Policy and Procedure.

Policy Development or Review Triggers

1. SPSR initiates review with Policy Owner according to schedule; or
2. Policy is identified for development/review in response to factors, such as:
 - a. Changes to governance documents;
 - b. Legislative, regulatory, by-law, or government Policy changes;
 - c. Sustained changes to operations or the external operating environment;
 - d. New best practices and/or research results affecting Policy area; or
 - e. External or internal review requests.

Minor Updates

Minor updates and revisions may be needed from time to time. In those cases, the Policy Owner will work directly with SPSR to make revisions. Ideally, such revisions would be tracked and accumulated throughout the year and updates only made once a year to the Policy. Minor updates may be made directly in the Policy and finalized with divisional executive approval. The Officers and affected groups (staff, tenants, and/or stakeholders) should be notified of the update.

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

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:

1. 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 Officers or the Board must include a note about Policies being retired.
2. If a Policy is **no longer required**, SPSR 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 division heads 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 that are applicable to their work.

As required by the nature of the Policy, employees may be required to attest or certify that they have reviewed key Policies. Attestations and certifications are managed by the Policy Owner in consultation with Legal, Human Resources and SPSR as required.

Policy and Process Administration

- SPSR maintains a Policy Index and Microsoft Word and Adobe PDF copies of all final Board and corporate Policies and Procedures, and all final divisional Policies.
- All final Board and corporate Policies and Procedures, and all final divisional Policies are stored and accessible to staff on inHouse.
- SPSR is responsible for maintaining the “Policies” page on inHouse in consultation with Policy Owners.
- 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

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 	ELT

Revision	Date	Description of Changes	Approval
		<ul style="list-style-type: none"> • Addition to criteria for Board Policies • Clarity added to SPSR role 	
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 (pending)

Appendix 1: Policy Index and Review Schedule

Appendix 2: Checklist for Policy Owners

Appendix 3: Templates – Policy; Procedure; Briefing Note

Item 8 – 2024 Review Schedule for Policies Requiring Board Approval
 Public GCHRC Meeting – March 26, 2024
 Report #: GCHRC:2024-09
Attachment 2

2024 Policy Review Schedule

Policy	Division	Committee	Estimated Timeline
Procurement Policy	Finance	BIFAC	Q2
Debt Management Policy (New)	Finance	BIFAC	Q3
Information Security Policy	Information Technology Services	BIFAC	Q3
Video Surveillance Policy	Operations – CSU	GCHRC	Q2
Human Rights, Harassment and Fair Access Policy	Legal	GCHRC	Q2
Corporate Business Continuity Management Policy (New)	Legal	GCHRC	Q3
Deputation Policy for Stakeholders	Legal	GCHRC	Q3
Tenant Transfer Policy	Operations	TSC	Q2
Relocation Policy	Development	TSC	Q4
Translation + Interpretation Policy	Strategic Planning & Communications	TSC	Q4