

Toronto Seniors Housing Corporation

Audit, Finance and Risk Committee (AFRC) Meeting Agenda

Date: Thursday, January 30, 2025

Time: 4:00 pm to 5:30 pm

Location: WebEx and Livestream

Item	Time	Description	Action	Type of Item	Presenter
1.	4:00 pm 2 min	Chair's Remarks	Information	N/A	Chair
2.	4:02 pm 2 min	Land and African Ancestral Acknowledgements	N/A	N/A	Chair
3.	4:04 pm 1 min	Approval of Public Meeting Agenda	Approval	Agenda	Chair
4.	4:05 pm 1 min	Chair's Poll re: Conflict of Interest	Declaration	N/A	Chair
5.	4:06 pm 1 min	Approval of Public Session Minutes of AFR Committee Meeting of November 28, 2024	Approval	Minutes	Chair
6.	4:07 pm 1 min	Approval of Closed Session Minutes of AFR Committee Meeting of November 28, 2024	Approval	Minutes	Chair
7.	4:08 pm 1 min	Action Item Review	Information	List	Chair
8.	4:09 pm 5 min	CEO Update	Information	Verbal Report	Tom Hunter
9.	4:14 pm 5 min	TSHC AFRC 2025 Workplan	Information	Report	Grant Coffey
10.	4:19 pm 20 min	Audit, Finance and Risk Policies: <ul style="list-style-type: none"> • Whistle Blower Protection Policy • Fraud Prevention Policy 	Approval	Report	Carol Francis / Vince Truong

Item	Time	Description	Action	Type of Item	Presenter
11.	4:39 pm 5 min	Procurement Change Order	Approval	Report	Vince Truong
12.	4:44 pm 5 min	2025 TSHC Budget	Information	Report	Vince Truong
13.	4:49 pm 1 min	Motion to move into Closed Session	Approval	N/A	Chair
14.	4:50 pm 1 min	<i>Confidential report dealing with matters that are not required to be disclosed under the Municipal Freedom of Information and Protection of Privacy Act, including but not limited to personal matters about identifiable individuals, a proposed or pending transaction with a third party, and recommendations of proposed policy or processes</i>	Approval	N/A	Chair
15.	4:51 pm 30 min		Approval	Report	Grant Coffey
16.	5:21 pm 1 min		Approval	N/A	Chair
17.	5:22 pm 1 min	Motion to Approve Closed Session Decisions	Approval		Chair
18.	5:23 pm 1 min	Adjournment	Approval	N/A	Chair

Toronto Seniors Housing Corporation
Audit, Finance, and Risk Committee (AFRC) Meeting
Public Minutes

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[View Live Stream Video Part 2 here](#)

Public Minutes

The Audit, Finance and Risk Committee (AFRC) of the TSHC Board held its meeting on Thursday, November 28, 2024, at 4:00 pm via WebEx video conference. This meeting was livestreamed.

Members in attendance:

Lawrence D’Souza, Chair
Fareed Amin
Warren Law
Brenda Parris

TSHC staff present:

Tom Hunter, *Chief Executive Officer*
Grant Coffey, *Director, Strategy and Business Management*
Vince Truong, *Interim Finance Lead*
Carol Francis, *Director, People & Culture*
Arlene Howells, *Director, Engagement, Partnerships and Communications (I)*
Tolu Solebo, *Manager, Financial Reporting & Compliance*
Karyn Bawden, *EA and Board Secretary*
Fatima Mahmood, *EA*
Emma Francis, *EA, Office of CEO*

Guests

Asli Mumin, City of Toronto

Item 1: Chair’s remarks

The Chair welcomed Board and Committee members, staff and online attendees. The Chair recognized November 25th was International Day for the Elimination of Violence against Women, and November 29th was International Day of Solidarity with the Palestinian People. He also noted that the month of November is Hindu, Albanian, and Lebanese Heritage Month.

The Chair noted there were no deputations and the November 28, 2024 agenda will focus on our 2025 Budget Update, Q3 & October 2024 Financial Results, 2024 Audit Engagement & Audit Timeline and last, the Enterprise Risk Management Framework Update. He also noted we would go into a closed session and then will come back to the public realm for adjournment.

The Chair then proceeded to the next Agenda Item.

Item 2: Land and African ancestral acknowledgements

The Chair went to the Land and African ancestral acknowledgements.

Once finished, the Chair went to the next Agenda Item.

Item 3: Approval of public meeting Agenda

The Chair asked for a motion to approve the Public Agenda of November 28, 2024 as presented.

Moved: Warren Law

Seconded: Fareed Amin

With All in favour, it was resolved that the Public Agenda of November 28, 2024, was approved as presented CARRIED

With that, the Chair moved to the next Agenda Item.

Item 4: Chair’s poll re: conflict of interest

The Chair asked the members of the Committee whether they were in conflict of interest with any agenda item. With no conflicts of interest being declared, the Chair continued to next Action Item.

Item 5: Approval of public minutes of AFRC meeting of October 2, 2024

The Chair asked if there were any edits or changes to the public meeting Minutes of October 2, 2024. Being none, the Chair asked for a motion to approve the AFRC public meeting minutes of October 2, 2024 as presented.

Moved: Warren Law

Seconded: Fareed Amin

With All in favour, it was resolved that the public meeting Minutes of October 2, 2024, were approved as presented CARRIED

The Chair then proceeded to the next Agenda Item.

Item 6: Approval of closed session minutes of AFRC meeting of October 2, 2024

The Chair asked if there were there any edits or changes to the Closed Session meeting minutes of October 2, 2024. Being none, the Chair asked for a motion to approve the AFRC Closed Session meeting minutes of October 2, 2024 as presented.

Moved: Warren Law

Seconded: Fareed Amin

With All in favour, it was resolved that the Closed Session meeting minutes of October 2, 2024, were approved as presented CARRIED

Item 7: Action item review

The Chair noted that although the two outstanding items on the Action Items list were addressed at the January 31, 2024, AFRC meeting, after discussing with TSHC staff, it was concluded that these items would be better suited at our TSHC Quality and Tenant Engagement Committee. With that, the Chair asked if anyone had any comments/additions to the Action Item List. With no further action items discussed, and the Committee satisfied, the Chair proceeded to next Agenda Item.

Item 8: CEO Update

At the Chair's invitation, Mr. Hunter gave his CEO Update highlighting:

- Committee Workplans and 2025 Meetings
 - He noted that we would keep the scheduled December 16th Board of Directors meeting, but cancel the December 11, 2024 Board meeting
- Cybersecurity
 - He advise the Committee that we have been in discussions with TCHC to bring a cybersecurity update to our first Board meeting in 2025 and noted any Cybersecurity matters would be discussed in Camera.
- Policies
 - He noted the Fraud Prevention Policy and Whistleblower Protection Policy are both planned to come to the next AFRC meeting in January.

The Chair thanked, Mr. Hunter for his update, and with no questions or comments, the Chair moved on to the next Agenda item.

Item 9: 2025 Budget Update

Through the Chair, Vince Truong went through the 2025 Budget Update, highlighting:

- 1st draft was submitted to the City of Toronto on September 10th as a stand-alone budget for Toronto Seniors Housing Corporation (TSHC). The preliminary budget was prepared and reflected the following in the initial submission:
 - Discussions with Directors, Managers, staff, and tenants,
 - Request for additional staff to support tenant-facing operations and corporate requirements,
 - Maintaining existing services,
 - Consideration of key cost drivers such as inflation,
 - Other impact in operations including salary, collective agreements, and other expected changes.

- Additional changes have been made since the 1st draft budget submission including:
 - Adjusted professional services and consultation to support ongoing business requirements,
 - Amended legal services and right-sized requirements for future contracts,
 - Found efficiencies and savings through reducing courier services, and using mail, and other reductions in office expenses,
 - Modified insurance cost with actual renewal rate,
 - Adjustments per City objectives to align with budgetary requirements,
 - Other refinements that have little or no major impact on tenant-facing operations.
- Key dates in the City of Toronto 2025 Budgeting Process:
 - Administrative Reviews – Oct. 1 – 31, 2024 (Completed)
 - Informal Budget Committee Reviews – Mid-October to Mid-November, 2024 (In progress and almost complete)
 - Target Final 2025 City Financial Planning Budget Decision – Wednesday November 27, 2024 (Pending)
 - Final 2025 Budget Note to City Financial Planning Division – December 9, 2024
 - City Budget Committee reviews – January 15-17, 2025
 - Council Budget Review and Approval – February 11, 2025

The Chair thanked Mr. Truong for his update and asked if there were any questions, Fareed Amin, Board Chair inquired about the Salary and Benefits, Mr. Truong noted the assessment would be done around February 2025. To that, the Chair noted there would be a more thorough conversation would be had in Camera. With that, the Chair proceeded to the next Agenda Item.

Item 10: Q3 & October 2024 Financial Results

Through the Chair, Vince Truong went through the Q3 & October 2024 Financial Results, highlighting:

- Through October 31, 2024, TSHC incurred operating expenses of \$37,754,104 on total revenue of \$42,107,826 for an excess of revenue over expenses of \$4,348,360 including amortization expense.

- The excess of revenues over expenses for the ten months included these factors:
 - Q3 surplus arising from the TCHC-TSHC reconciliation, which had a net positive effect of \$9,375,606 (revenue of \$8,058,576 and Service Delivery Agreement (SDA) expenses of \$1,317,030),
 - Higher than expected Salary and Benefit costs (-\$2,145,074 – detailed further in the Report),
 - Other savings in professional services, legal, insurance, and miscellaneous costs (detailed further in the Report),
 - The above factors contributed to a positive Actual versus Budget position for the ten months ending on October 31, 2024.

- Salaries and benefits were higher than budget by \$2,145,074 as result several factors including:
 - Lower than expected held vacancy rate versus budget.
 - Payout of unused vacation from prior year.
 - Adjustment to the Post-Retirement benefit accrual.
 - Hiring of additional front-line support and extension of existing support for the deferred corporate positions.
 - Increasing the staff health benefit reserve outlined by the benefit provider.
 - Higher than expected parental leave and lieu time costs, and lower vacation usage.
 - Salary band adjustment contingency, severance and other salary costs.

- Shared services with TCHC were lower by \$1,317,030, however, including the non-recoverable HST cost that was not budgeted, the overall cost was lower than budgeted by \$1,216,794.

- Professional and legal services were lower than budget by \$286,159 mainly due to timing differences on the expenditure. Other miscellaneous costs were lower by \$322,047 due to lower-than-expected expenditure in tenant

translations, staff training and development, office related expenses such as printing, and tenant engagement and staff meetings, which will contribute to a small savings by the end of the year.

- Statement of Financial Position:

1. Cash – \$3,155,215
2. Accounts Receivable - \$160,057
3. Due from TCHC (Short -Term) - \$8,159,815
4. Prepaid expenses - \$681,361
5. Due from TCHC (Long-Term) - \$4,180,700
6. Fixed Asset (Equipment), net - \$13,941
7. Accounts payable - \$3,593,991
8. Due to TCHC - \$1,674,030
9. Employee Benefits (Post-Retirement Benefits) - \$6,303,817

- Due from TCHC (Short-Term) included the deficit identified from the 2023 year-end and Q3 2024 TCHC-TSHC Reconciliation process of \$1,784,209 and \$9,375,606 respectively less an advance received for the 2024 TCHC-TSHC Reconciliation of \$3,000,000.

- Due from TCHC is the long-term receivable for the Post-Retirement Obligations transferred as of June 1, 2022 of \$4,180,700.

- Due to TCHC included the 2022 surplus from TSHC of \$1,443,724, and miscellaneous payable of \$230,306.

- The Accounts Payable balance comprises of October activity that has been processed through the bank in November. The balance includes:

- Payroll - \$2,835,072
- Pension and Benefits - \$610,528
- Vendor Payables - \$148,391

The Chair thanked Mr. Truong for his update and with no comments or questions, proceeded to the next Agenda Item.

Item 11: 2024 Audit Engagement & Audit Timeline

Through the Chair, Vince Truong went through the 2024 Audit Engagement & Audit Timeline, highlighting:

- KPMG serves as the external auditor for the City of Toronto (City) and many of its Agencies, Boards and Commissions and was selected as the City's external auditor following a call for proposals by the City's Auditor General.
- The City's agreement with KPMG is for 5 years, commencing with the 2020 fiscal year end, and ending in 2024 fiscal year end.
- The City approved KPMG to be TSHC's auditor for fiscal years 2021 to 2024, and the TSHC Board of Directors approved KPMG as its external auditor at the April 25, 2024 Board meeting for the 2024 fiscal year, with pricing to be discussed in late 2024.
- KPMG has provided a quote of \$20,000 (plus HST) for the audit work and inflationary impact, up from \$17,500 (plus HST) from prior year. This is a reasonable increase, and within budget.
- Preliminary planning is expected to begin in December 2024, and the audit work to begin on February 24, 2025 for approximately 2 weeks.
- The audit report is expected to be completed by March 21, 2025.

The Chair thanked Mr. Truong for the update and asked the Committee if there were any comments or questions. Jim Meeks inquired if there have been any changes in the Partners at KPMG. Mr. Truong answered that Kevin Travis was still Partner, but that the manager is new. With that, the Chair moved on to the next Agenda item.

Item 12: Enterprise Risk Management Framework Update

Through the Chair, Grant Coffey went through the Enterprise Risk Management Framework Update, highlighting:

- Q3 2024, a contract was awarded to MNP LLP, a consulting firm known for having one of the largest multidisciplinary risk management teams and a project was initiated.

- Project Plan
 - MNP has developed a detailed project plan that outlines key deliverables and completion date timelines.
- *ERM Policy*
 - The ERM Policy was presented for endorsement at the AFRC meeting on October 2, 2024, and was subsequently approved at the Board meeting on October 24, 2024. This policy outlines the responsibilities of various stakeholders, explains the Corporation's approach to Enterprise Risk Management (ERM), and details the structure and processes involved in the ERM framework and reporting.
- *ERM Framework*
 - MNP has developed an ERM framework. This framework outlines the essential concepts, processes, and tools needed for TSHC to effectively understand, assess, and manage risk. It defines key principles for risk management, along with roles, responsibilities, and reporting procedures, ensuring alignment with TSHC's governance and strategic objectives as stated in the ERM Policy. By applying this framework, TSHC will be able to identify, analyze, understand, address, and communicate risks effectively.
- *Initial Risk Assessment*
 - As part of the ERM Framework, from August to October 2024, MNP conducted interviews with TSHC staff, Board Directors, and key stakeholders about strategic risks at TSHC. Based on this information, MNP has drafted a Risk Register, which lists strategic risks along with their assessed likelihood and impact. In mid-November, TSHC's leadership team meets with MNP to review and validate the proposed Risk Register. MNP will review the feedback and input provided by the leadership team and will deliver a completed Risk Register that includes potential mitigation options and metrics for the top risks. Risks will be presented to the AFRC on a quarterly basis.

- *Next steps:*

- The finalized ERM Framework is set to be presented to the AFRC in Q1 2025.

The Chair thanked Mr. Coffey for the update and with no questions or comments, the moved on to the next Agenda item.

Item 13: Approval to Move into Closed Session

The Chair asked for a motion to approve the meeting move into Closed Session under By-Law Section 4.19, Subsections 1J and 1L.

Moved: Warren Law

Seconded: Brenda Parris

With all in favour, it was resolved that the Public meeting be terminated and move into the Closed Session CARRIED

Live Streaming ended and the meeting went into Closed Session.

Item 18: Adjournment

Upon returning to the Public Realm, the Chair thanked the Board and Committee members, staff and the online attendees. He then asked for a motion to adjourn the November 28, 2024 meeting.

Moved: Brenda Parris

Seconded: Warren Law

With all in favour, it was resolved that the TSHC AFRC November 28, 2024 meeting terminate CARRIED

Lawrence D’Souza, Chair
Audit, Finance and Risk Committee

**Toronto Seniors Housing Corporation
Audit, Finance and Risk Committee**

**Action Items List as of
November 28, 2024**

	Meeting Arising From	Description	Resp.	Status
No Action Items outstanding as at November 28, 2024				

Action Items Completed				
	Meeting Arising From	Description	Resp.	Status
1.	January 31, 2024	Staff to consult with TCHC on Environmental Renewal and Plan.	Grant Coffey	Sent to Quality and Tenant Engagement Committee
2.	January 31, 2024	Bring forward an overview of revitalization plans in the 2024 budget including net new potential housing for seniors.	Grant Coffey	Sent to Quality and Tenant Engagement Committee
3.	January 31, 2024	Staff to provide an update regarding the discussions about the allocation and the Lease Agreement.	Grant Coffey	Completed
4.	January 31, 2024	Staff will provide an update on the Letter of Guarantee and the Line of Credit to this Committee once we have more information.	Vince Truong	Completed

Action Items Completed				
	Meeting Arising From	Description	Resp.	Status
5.	November 28, 2023	Going forward quarterly adjustments be recorded in TSHC books the two entries - revenues and expenses.	Vince Truong	Completed
6.	November 28, 2023	Staff to review the agreement contract and confirm that TSHC is to receive the surplus after the first year.	Vince Truong	Completed
7.	November 28, 2023	Provide Committee with a consolidated list of items that fall under the category 'other costs' as indicated in the Statement of Operations.	Vince Truong	Completed
8.	September 28, 2023	Bring to Committee a presentation on building emergency procedures.	Brad Priggen	Completed

AFRC Proposed Work Plan 2025

Q1	Q2
January 30, 2025	April 9, 2025
<ul style="list-style-type: none"> - AFRC 2025 Workplan - 2025 TSHC Budget* - ERM Framework* - Fraud Prevention Policy* - Whistleblower Protection Policy* - Procurement Change Order* 	<ul style="list-style-type: none"> - 2024 Audit Report* and Presentation from Auditor - Recommendation to the City of Toronto TSHC's 2025 Auditor, City Reporting Requirements* - 2024 TCHC Year-End Reconciliation* - 2024 TSHC Financial Result* - 2024 Procurement Report

Q2	Q3
June 4, 2025	Sept 2, 2025
<ul style="list-style-type: none"> - Q1 & April 2025 Financial Result* - Q1 2025 TCHC Reconciliation* - ERM Framework and Reporting - Q1 Procurement Report* - 2026 Budget Planning - Internal Controls 	<ul style="list-style-type: none"> - 2026 Budget Update* - Q2 & July 2025 Financial Result* - Q2 2025 TCHC Reconciliation* - ERM Reporting - Q2 Procurement Report*

Q4	Q4
October 16, 2025	Nov 26, 2025
<ul style="list-style-type: none"> - 2026 Budget Update* - 2025-26 Insurance Renewal* & Insurance presentation (HSC) - Q2 & August 2025 Financial Result* - Accounts Payable Policy* - Investment Policy* 	<ul style="list-style-type: none"> - 2026 Proposed Budget* - Q3 & October 2025 Financial Result* - Q3 2025 TCHC Reconciliation* - 2025 Audit Engagement & Audit Timeline* - Q3 Procurement Report* - ERM Reporting

* indicates proceed to Board subsequently

Subject to change throughout the year

Toronto Seniors Housing Corporation
Audit, Finance, and Risk Committee (AFRC) Meeting

Meeting Date: January 30, 2025

Item Number: 10

Report Name: Whistleblower Protection Policy and Fraud Prevention Policy

To: Audit, Finance, and Risk Committee

From: Carol Francis, Director, People and Culture, and Vince Truong, Finance Lead (I)

Date of Report: January 30, 2025

Purpose:

The purpose of this report is to provide a recommendation to the Board of Directors for approval.

Recommendation:

It is recommended that the Audit, Finance, and Risk Committee (AFRC) approve and recommend to the Board of Directors to adopt the following resolutions:

- Approve the Whistleblower Protection Policy, as set out in Attachment 3 to this report.
- Approve the Fraud Prevention Policy, as set out in Attachment 4 to this report.

Reason for Recommendation:

As a good practice and to manage risk, it is important for organizations to have a policy to guide fraud prevention which TSHC has not formally put in place. Through an internal policy review, it was also identified that TSHC did not formally adopt Toronto Community Housing Corporation's (TCHC's) Fraud Prevention Policy and as per the Transition Agreement between TCHC and TSHC, TSHC is to comply with TCHC's Fraud Prevention Policy until replaced with an equivalent policy developed by TSHC. Subsequently, the development of equivalent policy for TSHC was recommended and scoping was targeted for Q3 2024.

Following the Corporate Governance and Human Resources Committee (CGHRC) on June 12, 2024, where TSHC's Whistleblower Protection Policy was an item for approval, it was identified that the Fraud Prevention Policy should be aligned with TSHC's Whistleblower Protection Policy and both be referred together to the Audit, Finance and Risk Committee.

Through consultations with the AFRC Chair post the CGHRC meeting in June 2024, supported by further policy considerations from the AFRC Chair in October 2024 and follow-up in December 2024 and January 2025, TSHC has revised/prepared both policies. The TSHC Leadership Team has also reviewed the policies including intake streams, roles and responsibilities, and discussed training plan and timeline in Q4 2024.

Below are the key components of the Whistleblower Protection Policy and Fraud Prevention Policy for Board approval. Please see Attachment 1 for a more detailed summary of the revisions for both policies as well.

Whistleblower Protection Policy

The Whistleblower Protection Policy provides guidelines for reporting wrongdoing and to provide reasonable protection from reprisal for those persons who, in good faith and with reasonable belief, report wrongdoing in accordance with this policy, it applies to all TSHC employees and to members of the Board of Directors. Tenants are also able to report wrongdoing and are provided reasonable protection from reprisal. This policy was initially adapted from TCHC and approved by TSHC Board of Directors on April 28, 2022.

This Policy was presented to the CGHRC on June 12, 2024, for endorsement to recommend to the Board of Directors for approval. At the request of the AFRC Chair, it was agreed that the policy would be reviewed in conjunction with the Fraud Prevention Policy and presented to AFRC at a later date.

As a result of this review, the policy has been updated and overall revisions include:

- Conversion to standard TSHC policy format.
- Title change from “Whistleblower Policy” to “Whistleblower Protection Policy.”
- Addition of an ethics reporting solution that is currently in place for TSHC and TCHC.
- Addition of TSHC commitment and shared values sections.
- Minor revisions to clarify roles and responsibilities of employees and managers.
- Review of policy considerations from the AFRC Chair, and oversight responsibility.
- Assignment of next review cycle (three years) to be in alignment with the Fraud Prevention Policy.

Please see Attachment 2 for a track-changes version and Attachment 3 for a clean version of the Whistleblower Protection Policy.

Fraud Prevention Policy

In July 2024, TSHC initiated review of TCHC's Fraud Prevention Policy and conducted an environmental scan of policies and By-laws from the City of Toronto, Toronto Transit Commission, City of Hamilton, and Ottawa Housing and related guidelines to develop a policy for reporting and investigating fraud claims.

The proposed Fraud Prevention Policy reinforces TSHC's commitment to protecting its revenue, property, information, reputation and other assets from attempts, by those working for, or on behalf of TSHC, to improperly gain either financial or other benefits to the detriment of TSHC or its stakeholders. The Policy also provides an updated process for intake of reports of suspected fraud, in alignment with the Whistleblower Protection Policy.

The proposed new Fraud Prevention Policy for TSHC includes:

- General changes to format and structuring using TSHC's Policy Management Framework and policy template.
- Updates to leverage TSHC's organizational structure and capacity.
 - TSHC uses an independent service provider to handle complaints through an ethics hotline, and complaints about TSHC staff, contractors, vendors, board members, and tenants are forwarded to TSHC.
 - The intake process for fraud reporting at TSHC has been aligned with TSHC's intake process for wrongdoing claims through the Whistleblower Protection Policy.

- Added section for Roles and Responsibilities (including AFRC's oversight responsibility) and captures additional detail regarding the intake of reports of suspected fraud.
- Added detail for where reports of suspected fraud should be reported based on person(s) implicated.
- Review of policy considerations from the AFRC Chair, and oversight responsibility.
- Addition of reporting requirements.
- Additional definitions included.

Please see Attachment 4 for the Fraud Prevention Policy.

The Procedure for the Fraud Prevention Policy is currently being developed for staff and Board members so that they will know who to make reports to and understand their rights and responsibilities with regards to reporting fraud, whistleblowing and reprisal protection. Once complete, the Procedure will provide guidelines for how complaints of suspected incidents of fraud will be triaged and investigated when staff, Finance Lead, CEO, or Board member(s) are involved. The details of the procedure, such as timelines, internal documentation and reporting processes are to be finalized in Q2 2025.

Staff training and communications for the policy and procedure will be developed with a target roll out by Q4 2025. A Frequently Asked Questions document for the reporting hotline is also being developed and will be posted to TSHC's website in Q1 along with other general information on how to report allegations of fraud currently available.

Carol Francis, Director, People and Culture

Vince Truong, Finance Lead (I)

List of Attachments:

1. Presentation – Summary of Policy Revisions
2. Whistleblower Protection Policy (track-changes)
3. Whistleblower Protection Policy (clean version)
4. Fraud Prevention Policy

DRAFT



Toronto Seniors Housing Corporation

Whistleblower Protection Policy and Fraud Prevention Policy

Attachment 1: Presentation - Summary of Policy Revisions

January 30, 2025

1. Whistleblower Protection Policy (1/3)

Key Recommended Revisions (based on internal review process)

- Conversion to standard TSHC policy format
- Title change from “Whistleblower Policy” to “Whistleblower Protection Policy”
- Addition of an ethics reporting solution that is currently in place for TSHC and TCHC
- Addition of TSHC commitment and shared values sections
- Minor revisions to clarify roles and responsibilities of employees and managers
- Review policy considerations from the AFRC Chair, and oversight responsibility (next slide)
- Assignment of next review cycle (three years). Note: if it’s required a policy revision process can be identified at any time (outside of the review cycle), in compliance with TSHC’s Policy Management Framework

1. Whistleblower Protection Policy (2/3)

Feedback from AFRC Chair	TSHC Response
<p>Address Board/Audit Committee’s oversight responsibilities</p>	<ul style="list-style-type: none"> • Includes information for board members on who they report wrongdoing to • The Finance Lead will prepare quarterly reports (when there have been allegations of fraud) to inform AFRC
<p>Specify clear and transparent process for investigating the allegations against the CEO, Board Chair, Board Members with signing authority and other Board Members</p>	<ul style="list-style-type: none"> • Allegations of workplace violence, bullying, harassment, discrimination, Code of Conduct, Conflict of Interest, etc. will be addressed in accordance with existing procedures and /or collective agreements
<p>Consider utilizing the existing resources and mechanisms at the City and its other related organizations</p>	<ul style="list-style-type: none"> • TSHC uses an independent service provider to handle fraud and waste complaints through an ethic hotline that provides a secure, anonymous and confidential way to report unethical behaviour to TSHC • Reports through the hotline go through TCHC per the Services Delivery Agreement. TCHC forwards complaints about TSHC tenants, staff, board members, and vendors to TSHC

1. Whistleblower Protection Policy (3/3)

Feedback from AFRC Chair	TSHC Response
Minor edits for consistency were recommended	<ul style="list-style-type: none">• Minor edits were completed as recommended
Recommended that Board of Directors (instead of only the Board Chair) be made aware when the Chief Executive Officer is implicated in a complaint	<ul style="list-style-type: none">• Updated to include: “The Board Chair will inform the Board of Directors unless there are extenuating circumstances or where the integrity of the investigation might be compromised during the investigation process.”
Links to related documents included	<ul style="list-style-type: none">• Link to be added to the Policy for the Frequently Asked Questions document, as well as being posted on TSHC’s website• Link to be added to the Policy (posted internally for staff) for the Media and Issues Protocol

2. Fraud Prevention Policy (1/3)

Key Recommended Revisions (based on internal review process)

- TSHC's draft policy contains content from TCHC's Fraud Prevention Policy, additional content has been aligned to TSHC's Whistleblower Protection Policy (pending approval), and informed by environmental scan of policies and By-laws from, City of Toronto, Toronto Transit Commission, City of Hamilton, and Ottawa Housing and related guidelines to develop a policy for reporting and investigating fraud claims.
- General changes to format and structuring using Policy Management Framework and policy template
- Updated to leverage TSHC's organizational structure and capacity. (The intake process for fraud reporting at TSHC has been aligned with TSHC's intake process for wrongdoing claims through TSHC's Whistleblower Protection Policy)
- Added section for Roles and Responsibilities and captures additional detail regarding intake of reports of suspected fraud e.g. where reports of suspected fraud should be reported based on person(s) implicated
- Review policy considerations from the AFRC Chair, and oversight responsibility (next slide)
- Addition of reporting requirements
- Additional definitions included
- Review cycle aligned to TSHC's Whistleblower Protection Policy's review cycle (every three years). Note: if it's required a policy revision process can be identified at any time (outside of the review cycle), in compliance with TSHC's Policy Management Framework

2. Fraud Prevention Policy (2/3)

Feedback from AFRC Chair	TSHC Response
<p>Address Board/Audit Committee’s oversight responsibilities</p>	<ul style="list-style-type: none"> • Includes information for board members on who they report fraud to • The Finance Lead will prepare quarterly reports (when there have been allegations of fraud) to inform AFRC
<p>Specify clear and transparent process for investigating the allegations against the CEO, Board Chair, Board Members with signing authority and other Board Members</p>	<ul style="list-style-type: none"> • Procedure document is being developed and will include specific process for investigating allegations against the CEO, and will leverage procedures from the Board of Directors Code of Ethics and Conduct for allegations against Board Members
<p>Consider utilizing the existing resources and mechanisms at the City and its other related organizations</p>	<ul style="list-style-type: none"> • TSHC uses an independent service provider to handle complaints through an ethic hotline that provides a secure, anonymous and confidential way to report unethical behaviour to TSHC • Reports through the hotline go through TCHC per the Services Delivery Agreement. TCHC forwards complaints about TSHC tenants, staff, board members, and vendors to TSHC

2. Fraud Prevention Policy (3/3)

Feedback from AFRC Chair	TSHC Response
<p>Minor edits for consistency were recommended</p>	<ul style="list-style-type: none"> Updated
<p>Recommended review cycle for procedure be updated more frequently than the Policy</p>	<ul style="list-style-type: none"> There is intention for the procedure to be reviewed after the first year, and then determine the frequency for review
<p>Simplify language in the Policy: “This includes neither facilitating nor ignoring current and past employee and tenant fraud.”</p>	<ul style="list-style-type: none"> Updated: “This includes neither facilitating or ignoring current and/or past incidents of suspected fraud when identified.”
<p>Recommended that Board of Directors (instead of only the Board Chair) be made aware when the Chief Executive Officer is implicated in a complaint</p>	<ul style="list-style-type: none"> Updated to include: “The Board Chair will inform the Board of Directors unless there are extenuating circumstances or where the integrity of the investigation might be compromised during the investigation process.”
<p>Links to related documents included</p>	<ul style="list-style-type: none"> Link to be added to the Policy for the Frequently Asked Questions document Link to be added to the Policy (posted internally for staff) for the Media and Issues Protocol

Procedure for Fraud Prevention Policy

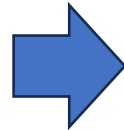
- Currently in development
- Staff and Board members will be able to refer to the procedure to understand:
 - their rights and responsibilities with regards to reporting fraud, whistleblowing and reprisal protection
 - who they can report suspected fraud to
 - how complaints of suspected incidents of fraud will be triaged and investigated when staff, Finance Lead, CEO, or Board member(s) are involved
- The details of the procedure, such as timelines, internal documentation and reporting processes are to be finalized in Q2 2025
- A Frequently Asked Questions document for the reporting hotline is also being developed and will be posted to TSHC's website in Q1 along with general information on how to report allegations of fraud currently available

Intake of claims through hotline

Report is made through hotline



Reporting is managed by an independent service provider



TSHC receives report

Report is about TSHC tenant

TSHC preliminary reviewer

Director, Operations

Report is about TSHC staff, contractor, vendor, or Board member

Director, People and Culture

Report is about Director, People and Culture

CEO

Next steps for report

Determines next steps through RGI administration protocol

Redirects claims of fraud related to the Community Activities Fund to the Manager, Community Programs and Partnerships for investigation

Pursue investigations under Whistleblower Protection Policy

Refer the investigation under Fraud Prevention Policy to Finance Lead or independent investigator

Close case

Determines next steps

Intake contact at TSHC depends on who is implicated in the complaint:

- Tenant
- Staff
- Contractor
- Vendor
- Board member

Key highlights of WPP and FPP

	Whistleblower Protection Policy (pending approval)	Fraud Prevention Policy (pending approval)
Policy Objective	<ul style="list-style-type: none"> Provides guidelines for reporting wrongdoing, and reasonable protection from reprisal for those persons who report wrongdoing Fraud can be reported under the Whistleblower Protection Policy, but may be investigated or addressed in accordance with TSHC's Fraud Prevention Policy 	<ul style="list-style-type: none"> Sets out responsibilities for reporting suspected fraud and provides high level guidelines for the conduct of investigations
Reporting	<ul style="list-style-type: none"> TSHC employees who are aware that wrongdoing or fraud has occurred may report through the ethics hotline, or through their manager, or department director 	
Investigations	<ul style="list-style-type: none"> Investigations to be carried out in accordance with established corporate policies and procedures 	<ul style="list-style-type: none"> Includes guidelines
Independent Investigator	<ul style="list-style-type: none"> Investigations may be conducted by an external investigator if necessary and at the discretion of TSHC Although not explicitly state in the Fraud Prevention Policy this information is included in the draft Procedure 	
Reprisal/ Whistleblower Protection	<ul style="list-style-type: none"> Directs employees who believe they are the subject of a reprisal to notify the Director, People and Culture 	<ul style="list-style-type: none"> Directs employees who believe they are the subject of a reprisal to notify the Director, People and Culture The Policy does not include further detail on investigating reprisals, instead the Policy refers the reader to TSHC's Whistleblower Protection Policy for more information
Policy Review Schedule	<ul style="list-style-type: none"> Policy review every three years, or earlier if necessary Annual attestation to confirm that all staff have read and agree to abide by the policy 	

~~TORONTO SENIORS HOUSING CORPORATION~~ **Toronto Seniors Housing Corporation (TSHC)**

Whistleblower Protection Policy

Policy Sponsor: Director, People and Culture

Approver: Board of Directors

Initial Approval Date: April 28, 2022

Date of Last Revision, if applicable: XXXX XX, XXXX

Effective Date: February 26, 2025 (pending approval)

Policy Statement

Toronto Seniors Housing Corporation (TSHC) is committed to enhancing public confidence in what we do. In performing their duties and responsibilities, employees are expected to promote shared values and observe the highest possible standards of professionalism and service.

Our Commitment

With a focus on the unique needs of seniors, we are committed to being a leader in the delivery of quality, affordable housing for seniors. Our commitment includes engaging and collaborating with our tenants, our staff, and our partners towards providing excellent service for the well-being of our tenants.

Our Shared Values

Toronto Seniors Housing Corporation policies, procedures, and directives, including the Employee Code of Conduct, are based on our shared values. These values inform our decision-making and guide our behaviour in all activities related to our work.

Respect – Our culture is built on respect, trust and open and honest communication among tenants, staff, and service providers. We respect each

TSHC Whistleblower Protection Policy [updated January 22, 2025]

tenant's independence and privacy. We will assist tenants to find the services they prefer.

Inclusion – Quality of life for seniors is enhanced by living in vibrant and diverse communities. We strive for inclusion and equity.

Accountability – We are accountable to our tenants, our shareholder (the City of Toronto), and the public. We are committed to transparency. We are clear on our goals. We set targets and report our results. We demonstrate integrity and responsible stewardship of our resources.

Innovation – We are creative, innovative, adaptive, and flexible to meet the needs of our current and future tenants. We are a catalyst for positive change, energizing communities, and partners to join us to achieve our mandate.

Toronto Seniors Housing Corporation is also committed to promoting integrity, ethics, accountability, and transparency in everything we do. TSHC recognizes. We recognize it is in the best interests of the Corporation public interest to ensure that all disclosures are investigated, and to protect from reprisal to the fullest extent possible, those employees who in good faith report wrongdoing.

Toronto Seniors Housing Corporation will not tolerate wrongdoing or reprisals against employees who report wrongdoing, and all employees have a duty to report suspected wrongdoing. Disclosures of wrongdoing will be investigated in accordance with these provisions in order to maintain and enhance public confidence by encouraging in the reporting delivery of wrongdoing taking place within TSHC to designated individuals at the organization Toronto Seniors Housing Corporation services and use of Toronto Seniors Housing Corporation resources.

Policy Objective(s)

The purpose of this ~~policy~~Policy is to provide guidelines for reporting wrongdoing and to provide reasonable protection from reprisal for those persons who, in good faith and with reasonable belief, report wrongdoing in accordance with this ~~policy~~Policy.

TSHC Whistleblower Protection Policy [updated January 22, 2025]

Scope

This ~~policy~~Policy applies to all employees of ~~TSHC~~Toronto Seniors Housing Corporation, whether they work on a full-time or ~~part-time~~temporary basis. This ~~policy~~Policy also applies to members of the Board of Directors of ~~TSHC~~Toronto Seniors Housing Corporation as set out in this ~~policy~~Policy. This ~~policy~~Policy provides reasonable protection from reprisal for all employees and Directors of ~~TSHC~~Toronto Seniors Housing Corporation, who in good faith report wrongdoing under this ~~policy~~Policy.

Tenants of ~~TSHC~~Toronto Seniors Housing Corporation and members of the public are also encouraged to report wrongdoing and are provided reasonable protection from reprisal in accordance with this ~~policy~~Policy.

Out of Scope

This ~~policy~~Policy covers matters that are in the public interest and for ~~which~~ which there are no existing processes or mechanisms for reporting and investigation. For example, it is not intended to address matters through existing procedures where corporate policy and/or ~~the~~collective agreementagreements (if applicable) are generally available to address individual complaints by employees of workplace discrimination or harassment. These complaints will not be seen as wrongdoing under this ~~policy~~Policy in the ordinary course. The exception is fraud which employees can report under this ~~policy~~Policy, but which may be investigated or addressed in accordance with the Fraud Prevention Policy.

Values

~~All TSHC policies, including this policy, are based on TSHC's core values of respect, accountability, community collaboration, integrity and accessibility for persons with disabilities.~~

~~TSHC expects employees to use proper judgment and act in a way that reflects these core values and corporate policy. Employees should also support the high-~~

TSHC Whistleblower Protection Policy [updated January 22, 2025]

~~standards expected of a corporation established to deliver seniors' social housing in the City of Toronto. TSHC is also committed to maintaining an environment where people can raise concerns about improper behavior without fear of reprisal. The effectiveness of these commitments and TSHC's policies, procedures, and directives are dependent on persons being able to report suspected cases of wrongdoing without fear of reprisal for doing so.~~

Definitions

Director: Any individual member of the ~~TSHC~~Toronto Seniors Housing Corporation Board of Directors.

~~**Wrongdoing:** Refers collectively to any serious act (or failure to act) that is covered by this policy and which:~~

- ~~• Constitutes fraud or waste as defined under this policy.~~
- ~~• Is a violation of TSHC policies, procedures, or~~
- ~~• directives.~~
- ~~• Risks the health or safety of residents, employees, or visitors to THSC sites.~~
- ~~• Is unlawful under any municipal, provincial or federal laws.~~
- ~~• Knowingly directs or counsels another person to engage in such acts.~~
- ~~• Is designed or intended to conceal conduct prohibited under this policy.~~

Fraud: Any dishonest act that results in actual loss or risk of loss, deception, misappropriation of resources or the manipulation of data to the advantage or disadvantage of a person or entity. Fraud includes any misuse, or attempt to misuse:

- one's position in the company; and/or,
- ~~a THSC~~Toronto Seniors Housing Corporation asset for personal gain or purposes unrelated to company business.

Fraud includes corruption, which is defined as the offering, giving, or soliciting, or accepting of an inducement or reward that may improperly influence the action of a person or entity.

TSHC Whistleblower Protection Policy [updated January 22, 2025]

For more information, including examples of Fraud or Corruption, please see the Fraud Prevention Policy.

Reprisal: Actions taken against another person as a direct result or in retaliation for making a report under this ~~policy~~ Policy, being suspected of making a report under this ~~policy~~ Policy, or participating in an investigation under this ~~policy~~ Policy. ~~Reprisal includes~~ harassment, discrimination, intimidation, dismissal, suspension, demotion, discipline, termination, suspension, coercion, discipline, imposition of another reprisal include but are not limited to:

- coercion
- demotion
- discipline
- discrimination
- dismissal
- harassment
- intimidation
- penalty
- suspension
- termination, or, in

In the case of an employee, reprisal could include any other action which adversely affects their working conditions. ~~Reprisal includes, or~~ a threat to take any such actions and knowingly directing or counselling of another person to engage in reprisal.

Waste: Any other gross mismanagement, theft, falsification, misappropriation, or misuse of ~~TSHC~~ Toronto Seniors Housing Corporation facilities, resources, and/or assets, either deliberate or by negligence, which is not covered under the Fraud Prevention Policy.

Whistleblower: An employee, ~~Director~~ member of the Board of Directors, or tenant who, in good faith and with reasonable belief that wrongdoing has occurred, makes a report under this ~~policy~~ Policy.

TSHC Whistleblower Protection Policy [updated January 22, 2025]

Policy Details

Reporting Wrongdoing

~~Any employee who suspects or has knowledge of any occurrence of Fraud, shall immediately notify his/her manager or the General Counsel and Corporate Secretary, or report to the ethics hotline. An employee who suspects or has knowledge of any other type of wrongdoing will immediately notify his/her manager or report to the ethics hotline. A tenant who suspects or has knowledge of wrongdoing shall notify the General Counsel and Corporate Secretary. If the occurrence involves the General Counsel and Corporate Secretary, the employee or tenant shall notify the Chief Executive Officer.~~

~~Any Director~~Wrongdoing: Refers collectively to any serious act (or failure to act) that is covered by this Policy and which:

- ~~• constitutes fraud or waste of Toronto Seniors Housing Corporation resources or assets as defined under this Policy~~
- ~~• is a violation of Toronto Seniors Housing Corporation policies, procedures, or directives~~
- ~~• risks the health or safety of tenants, employees, or visitors to Toronto Seniors Housing Corporation sites~~
- ~~• is unlawful under any municipal, provincial or federal laws~~
- ~~• knowingly directs or counsels another person to engage in such acts~~
- ~~• is designed or intended to conceal conduct prohibited under this Policy~~

Roles and Responsibilities

The Chief Executive Officer is responsible to:

- ~~• Lead and advance a culture rooted in the highest ethical standards for Toronto Seniors Housing Corporation employees.~~
- ~~• Ensure Toronto Seniors Housing Corporation employees understand their ethical rights and responsibilities, including their responsibilities under this~~

TSHC Whistleblower Protection Policy [updated January 22, 2025]

Policy.

- Investigate or refer responsibility to Toronto Seniors Housing Corporation staff to investigate alleged wrongdoing and ensure these investigations are appropriately conducted.
- Ensure that Toronto Senior Housing Corporation employees who, in good faith, report wrongdoing are protected from reprisal in accordance with this Policy.
- Investigate and resolve allegations of employee misconduct that do not constitute wrongdoing as defined in this Policy.
- Implement corrective actions to strengthen management oversight and make improvements to internal control systems and procedures based on findings.

Mangers/ Department Directors are responsible to:

- Promote ethical conduct and support ethical decision-making in their areas of responsibility.
- Undertake investigations of alleged wrongdoing seriously and appropriately.
- Investigate and resolve allegations of employee misconduct that do not constitute wrongdoing as defined in this Policy.
- Ensure that TSHC employees under their supervision, who in good faith, report wrongdoing are protected from reprisals in accordance with this Policy.
- Establish and maintain a system of internal controls to detect and prevent wrongdoing.
- Be familiar with the types of wrongdoing that could occur within their area of responsibility and be proactive in taking steps to guard against such activities.

Policy Content

Toronto Seniors Housing Corporation strives to be an employer of choice by fostering a culture of innovation that engages, empowers, and supports staff.

We take pride in conducting ourselves with personal integrity, ethics, honesty, and diligence in performing our duties and ensuring we are protecting the public trust and confidence in Toronto Seniors Housing Corporation.

TSHC Whistleblower Protection Policy [updated January 22, 2025]

Toronto Seniors Housing Corporation expects employees to use proper judgment and act in a way that reflects our values and corporate policy. Employees should also support the high standards expected of a corporation established to deliver seniors' social housing in the City of Toronto. Toronto Seniors Housing Corporation is also committed to maintaining an environment where people can raise concerns about improper behavior without fear of reprisal. The effectiveness of these commitments and Toronto Seniors Housing Corporation's policies, procedures, and directives are dependent on persons being able to report suspected cases of wrongdoing without fear of reprisal for doing so.

Disclosure of Wrongdoing

Toronto Seniors Housing staff, tenants and the general public can report suspected fraud or waste matters involving TSHC tenants or staff through our ethics hotline. This hotline is operated by an independent service provider. To make sure reports remain anonymous and confidential, reports through a live agent will not be recorded or traced.

The hotline (ethics reporting/whistleblowing solution) provides a secure, anonymous and confidential way to raise concerns or report unethical behaviour to Toronto Seniors Housing Corporation. There are three ways to submit a report: online, by phone, or by mail. All reports will be sent securely to a TSHC reviewer for further action. Reports involving employees or members of the Board of Directors will be received by the Director, People and Culture.

For complete instructions, please see the Frequently Asked Questions document.

Toronto Seniors Housing Corporation employees who are aware that wrongdoing has occurred may also immediately notify their manager, or Departmental Director. Employees who report wrongdoing in good faith will be protected from reprisal. If the occurrence involves the Departmental Director, the employee shall notify the Chief Executive Officer. If the occurrence involves the Chief Executive Officer, the employee shall notify the Director, People and Culture, who shall confer with the Board Chair.

TSHC Whistleblower Protection Policy [updated January 22, 2025]

Allegations of wrongdoing received by Toronto Senior Housing Corporation managers must be immediately reported to their Department Director or the Chief Executive Officer if the Department Director is implicated in the allegation.

Any Toronto Seniors Housing Corporation employee who knowingly makes a false complaint in bad faith or who knowingly makes a false or misleading statement that is intended to mislead an investigation of a complaint, may be subject to disciplinary action up to and including dismissal.

Any member of the Board of Directors who suspects or has knowledge of any occurrence of Fraud or any other type of wrongdoing shall immediately notify the Board Chair ~~who will consult with the General Counsel and Corporate Secretary on the appropriate actions to take.~~ If the occurrence involves the Board Chair, the Board Director shall report the occurrence to the Vice-Chair of GHRC ~~who will consult with the General Counsel and Corporate Secretary on the appropriate actions to take~~ the Board.

Implementation

An employee who believes they are the subject of a Reprisal will should notify the ~~Vice-President~~ Director of Human Resources People and Culture immediately. Where a manager or supervisor is informed of, or becomes aware of, a reprisal, the manager or supervisor will should notify the Director of ~~Human Resources People and Culture~~ immediately. If the complaint involves the Director of ~~Human Resources People and Culture~~ or a ~~Director member~~ of the ~~organization~~ Board of Directors, the reprisal ~~should~~ shall be reported to the Chief Executive Officer. If the Reprisal involves the Chief Executive Officer, the employee, manager or supervisor will notify the Director of People and Culture, who shall confer with the Board Chair.

Any allegation of a reprisal will be reviewed and may be the subject of a formal investigation. ~~TSHC~~ Toronto Seniors Housing Corporation will determine who will lead the investigation, and the ~~divisions/~~ persons to be consulted, based on the subject matter at issue.

TSHC Whistleblower Protection Policy [updated January 22, 2025]

Investigations may be conducted by an external investigator if necessary and at the discretion of ~~TSHC~~Toronto Seniors Housing Corporation.

The Director of ~~Human Resources~~People and Culture will determine what, if any steps are appropriate to stop, reverse, or remedy a reprisal. For complaints involving the ~~Vice-President~~Director of ~~Human Resources~~People and Culture, the ~~President~~ Chief Executive Officer will determine what, if any steps are appropriate to stop, reverse, or remedy a reprisal. For complaints involving a ~~Director~~member of the Board of Directors, the Chief Executive Officer in consultation with the Board Chair (or Vice-Chair if the complaint is against the Chair) will determine what, if any steps are appropriate to stop, reverse, or remedy a reprisal. For complaints involving the Chief Executive Officer, the Board Chair, in consultation with the Director of People and Culture, will determine what, if any steps are appropriate to stop, reverse, or remedy a reprisal. The Board Chair will inform the Board of Directors unless there are extenuating circumstances or where the integrity of the investigation might be compromised during the investigation process.

Once the ~~TSHC~~Toronto Seniors Housing Corporation has provided an assurance of confidentiality to a whistleblower, the individual's identity cannot be revealed without the individual's consent.

~~With respect to TSHC's~~Toronto Seniors Housing Corporation's commitment to provide reasonable protection for whistleblowers, ~~this~~ will include:

- MakingTaking all reasonable efforts to protect the identity of all individuals involved in an investigation, including the identity of an individual alleging wrongdoing and the identity of an individual alleged to have committed wrongdoing, to the fullest extent possible. All information collected under this Policy or through subsequent investigations shall be held in confidence, except where disclosure may be necessary to further the investigation, or as required by law.
- Taking all reasonable efforts to protect the identities of whistleblowers by not sharing a whistleblower's identity, or information that could reasonably be

TSHC Whistleblower Protection Policy [updated January 22, 2025]

expected to reveal the whistleblower's identity, with others, including a law enforcement agency without the whistleblower's explicit consent.

- Respecting the decision of the whistleblower as to how much personal information will be provided; ~~and,~~
- Adhering to Canada's Criminal Code which means ~~TSHC~~ Toronto Seniors Housing Corporation cannot dismiss, suspend, demote, discipline, harass, or otherwise disadvantage whistleblowers, or deny ~~you~~ them a benefit of employment when the information provided was given in good faith and that was reasonably believed to be true and accurate.

Compliance and Monitoring

~~TSHC~~ Toronto Seniors Housing Corporation will not tolerate wrongdoing or reprisals against anyone who reports wrongdoing, and all employees have a duty to report suspected wrongdoing. No employee or ~~Director~~ member of the Board of Directors will take any action in reprisal against a Whistleblower for making, or being suspected of making, a report of wrongdoing under this ~~policy~~ Policy. No employee or ~~Director~~ member of the Board of Directors will take any action in reprisal against any person who participates in an investigation under this ~~policy~~ Policy.

An employee who is found to have engaged in reprisal prohibited by this ~~policy~~ Policy shall be the subject of discipline, up to and including dismissal for cause.

Reprisal by a ~~Director~~ member of the Board of Directors shall be treated in the same manner as a violation of the Code of Ethics and Conduct for the Board of Directors. Conduct prohibited by this ~~policy~~ Policy, which is contrary to legislation, including that of a criminal nature, may be addressed or reported accordingly.

An employee who knowingly makes a false or misleading report under this ~~policy~~ Policy, or who knowingly makes a false or misleading statement in an investigation under this ~~policy~~ Policy, may be the subject of discipline, up to and including dismissal for cause.

TSHC Whistleblower Protection Policy [updated January 22, 2025]

Employees and other persons are expected to co-operate fully in an investigation under this ~~policy. Employees who are contacted~~ Policy.

Employees who improperly breach confidentiality will be subject to legal action or disciplinary action up to and including dismissal as determined by the Chief Executive Officer.

Employees who are contacted by the media regarding an investigation under this Policy must refer all inquiries to the Communications team. For further information, please see the Media and Issues Protocol.

~~Governing and Applicable~~ The Chair of the Audit, Finance and Risk Management Committee (AFRC) and the Finance Team shall be informed of any allegation of fraud involving an employee or member of the Board of Directors of the Toronto Seniors Housing Corporation in order to satisfy audit requirements.

Related Legislation, Regulations, and TSHC Policies:

- Ontario *Employment Standards Act*
- *Ontario Human Rights Code*
- *Occupational Health and Safety Act*
- *Criminal Code* of Canada

Related Policies and Procedures

- TSHC Employee Code of Conduct
- TSHC Employee Conflict of Interest Policy
- ~~Code of Conduct~~
- TSHC Fraud Prevention Policy
- TSHC Board of Directors Code of Ethics and Conduct
- TSHC Board of Directors Reimbursement Policy
- TSHC Finance Policies

Commencement and Review

TSHC Whistleblower Protection Policy [updated January 22, 2025]

Amendments (Revision History):

Initial policy approved by Board of Directors on April 28, 2022

Policy reviewed on January 16, 2025, with the following revisions, and approved by the Board of Directors on XXXX XX, XXXX:

- conversion to standard TSHC policy format
- title change from “Whistleblower Policy” to “Whistleblower Protection Policy”
- addition of the ethics reporting/whistleblowing solution that is currently in place for Toronto Community Housing Corporation and TSHC
- addition of TSHC commitment and shared values sections
- minor revisions to clarify roles and responsibilities of employees and managers
- assignment of next review cycle (three years)

Next Scheduled Review Date: 2028

This Policy will be reviewed once every three years.

Policy Contact

Director, People and Culture

Appendices

- Frequently Asked Questions (under review)
- TSHC Media and Issues Protocol

Toronto Seniors Housing Corporation (TSHC) Whistleblower Protection Policy

Policy Sponsor: Director, People and Culture

Approver: Board of Directors

Initial Approval Date: April 28, 2022

Date of Last Revision, if applicable: XXXX XX, XXXX

Effective Date: February 26, 2025 (pending approval)

Policy Statement

Toronto Seniors Housing Corporation (TSHC) is committed to enhancing public confidence in what we do. In performing their duties and responsibilities, employees are expected to promote shared values and observe the highest possible standards of professionalism and service.

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Toronto Seniors Housing Corporation policies, procedures, and directives, including the Employee Code of Conduct, are based on our shared values. These values inform our decision-making and guide our behaviour in all activities related to our work.

Respect – Our culture is built on respect, trust and open and honest communication among tenants, staff, and service providers. We respect each tenant’s independence and privacy. We will assist tenants to find the services

they prefer.

Inclusion – Quality of life for seniors is enhanced by living in vibrant and diverse communities. We strive for inclusion and equity.

Accountability – We are accountable to our tenants, our shareholder (the City of Toronto), and the public. We are committed to transparency. We are clear on our goals. We set targets and report our results. We demonstrate integrity and responsible stewardship of our resources.

Innovation – We are creative, innovative, adaptive, and flexible to meet the needs of our current and future tenants. We are a catalyst for positive change, energizing communities, and partners to join us to achieve our mandate.

Toronto Seniors Housing Corporation is also committed to promoting integrity, ethics, accountability, and transparency. We recognize it is in the public interest to ensure that all disclosures are investigated, and to protect from reprisal to the fullest extent possible, those employees who in good faith report wrongdoing.

Toronto Seniors Housing Corporation will not tolerate wrongdoing or reprisals against employees who report wrongdoing, and all employees have a duty to report suspected wrongdoing. Disclosures of wrongdoing will be investigated in accordance with these provisions in order to maintain public confidence in the delivery of Toronto Seniors Housing Corporation services and use of Toronto Seniors Housing Corporation resources.

Policy Objective(s)

The purpose of this Policy is to provide guidelines for reporting wrongdoing and to provide reasonable protection from reprisal for those persons who, in good faith and with reasonable belief, report wrongdoing in accordance with this Policy.

Scope

This Policy applies to all employees of Toronto Seniors Housing Corporation,
TSHC Whistleblower Protection Policy [updated January 22, 2025]

whether they work on a full-time or temporary basis. This Policy also applies to members of the Board of Directors of Toronto Seniors Housing Corporation as set out in this Policy. This Policy provides reasonable protection from reprisal for all employees and Directors of Toronto Seniors Housing Corporation, who in good faith report wrongdoing under this Policy.

Tenants of Toronto Seniors Housing Corporation and members of the public are also encouraged to report wrongdoing and are provided reasonable protection from reprisal in accordance with this Policy.

Out of Scope

This Policy covers matters that are in the public interest and for which there are no existing processes or mechanisms for reporting and investigation. For example, it is not intended to address matters through existing procedures where corporate policy and/or collective agreements (if applicable) are generally available to address individual complaints by employees of workplace discrimination or harassment. These complaints will not be seen as wrongdoing under this Policy in the ordinary course. The exception is fraud which employees can report under this Policy, but which may be investigated or addressed in accordance with the Fraud Prevention Policy.

Definitions

Director: Any individual member of the Toronto Seniors Housing Corporation Board of Directors.

Fraud: A dishonest act that results in actual loss or risk of loss, deception, misappropriation of resources or the manipulation of data to the advantage or disadvantage of a person or entity. Fraud includes any misuse, or attempt to misuse:

- one's position in the company; and/or,
- Toronto Seniors Housing Corporation asset for personal gain or purposes unrelated to company business.

Fraud includes corruption, which is defined as the offering, giving, or soliciting, or accepting of an inducement or reward that may improperly influence the action of a person or entity. For more information, including examples of Fraud or Corruption, please see the Fraud Prevention Policy.

Reprisal: Actions taken against another person as a direct result or in retaliation for making a report under this Policy, being suspected of making a report under this Policy, or participating in an investigation under this Policy. Examples of reprisal include but are not limited to:

- coercion
- demotion
- discipline
- discrimination
- dismissal
- harassment
- intimidation
- penalty
- suspension
- termination

In the case of an employee, reprisal could include any other action which adversely affects their working conditions, or a threat to take any such actions and knowingly directing or counselling of another person to engage in reprisal.

Waste: Any other gross mismanagement, theft, falsification, misappropriation, or misuse of Toronto Seniors Housing Corporation facilities, resources, and/or assets, either deliberate or by negligence, which is not covered under the Fraud Prevention Policy.

Whistleblower: An employee, member of the Board of Directors, or tenant who, in good faith and with reasonable belief that wrongdoing has occurred, makes a report under this Policy.

Wrongdoing: Refers collectively to any serious act (or failure to act) that is covered by this Policy and which:

- constitutes fraud or waste of Toronto Seniors Housing Corporation resources or assets as defined under this Policy
- is a violation of Toronto Seniors Housing Corporation policies, procedures, or directives
- risks the health or safety of tenants, employees, or visitors to Toronto Seniors Housing Corporation sites
- is unlawful under any municipal, provincial or federal laws
- knowingly directs or counsels another person to engage in such acts
- is designed or intended to conceal conduct prohibited under this Policy

Roles and Responsibilities

The Chief Executive Officer is responsible to:

- Lead and advance a culture rooted in the highest ethical standards for Toronto Seniors Housing Corporation employees.
- Ensure Toronto Seniors Housing Corporation employees understand their ethical rights and responsibilities, including their responsibilities under this Policy.
- Investigate or refer responsibility to Toronto Seniors Housing Corporation staff to investigate alleged wrongdoing and ensure these investigations are appropriately conducted.
- Ensure that Toronto Senior Housing Corporation employees who, in good faith, report wrongdoing are protected from reprisal in accordance with this Policy.
- Investigate and resolve allegations of employee misconduct that do not constitute wrongdoing as defined in this Policy.
- Implement corrective actions to strengthen management oversight and make improvements to internal control systems and procedures based on findings.

Managers/ Department Directors are responsible to:

- Promote ethical conduct and support ethical decision-making in their areas of responsibility.
- Undertake investigations of alleged wrongdoing seriously and appropriately.
- Investigate and resolve allegations of employee misconduct that do not constitute wrongdoing as defined in this Policy.
- Ensure that TSHC employees under their supervision, who in good faith, report wrongdoing are protected from reprisals in accordance with this Policy.
- Establish and maintain a system of internal controls to detect and prevent wrongdoing.
- Be familiar with the types of wrongdoing that could occur within their area of responsibility and be proactive in taking steps to guard against such activities.

Policy Content

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We take pride in conducting ourselves with personal integrity, ethics, honesty, and diligence in performing our duties and ensuring we are protecting the public trust and confidence in Toronto Seniors Housing Corporation.

Toronto Seniors Housing Corporation expects employees to use proper judgment and act in a way that reflects our values and corporate policy. Employees should also support the high standards expected of a corporation established to deliver seniors' social housing in the City of Toronto. Toronto Seniors Housing Corporation is also committed to maintaining an environment where people can raise concerns about improper behavior without fear of reprisal. The effectiveness of these commitments and Toronto Seniors Housing Corporation's policies, procedures, and directives are dependent on persons being able to report suspected cases of wrongdoing without fear of reprisal for doing so.

Disclosure of Wrongdoing

Toronto Seniors Housing staff, tenants and the general public can report

suspected fraud or waste matters involving TSHC tenants or staff through our ethics hotline. This hotline is operated by an independent service provider. To make sure reports remain anonymous and confidential, reports through a live agent will not be recorded or traced.

The hotline (ethics reporting/whistleblowing solution) provides a secure, anonymous and confidential way to raise concerns or report unethical behaviour to Toronto Seniors Housing Corporation. There are three ways to submit a report: online, by phone, or by mail. All reports will be sent securely to a TSHC reviewer for further action. Reports involving employees or members of the Board of Directors will be received by the Director, People and Culture.

For complete instructions, please see the Frequently Asked Questions document.

Toronto Seniors Housing Corporation employees who are aware that wrongdoing has occurred may also immediately notify their manager, or Departmental Director. Employees who report wrongdoing in good faith will be protected from reprisal. If the occurrence involves the Departmental Director, the employee shall notify the Chief Executive Officer. If the occurrence involves the Chief Executive Officer, the employee shall notify the Director, People and Culture, who shall confer with the Board Chair.

Allegations of wrongdoing received by Toronto Senior Housing Corporation managers must be immediately reported to their Department Director or the Chief Executive Officer if the Department Director is implicated in the allegation.

Any Toronto Seniors Housing Corporation employee who knowingly makes a false complaint in bad faith or who knowingly makes a false or misleading statement that is intended to mislead an investigation of a complaint, may be subject to disciplinary action up to and including dismissal.

Any member of the Board of Directors who suspects or has knowledge of any occurrence of Fraud or any other type of wrongdoing shall immediately notify the Board Chair. If the occurrence involves the Board Chair, the Board Director shall report the occurrence to the Vice-Chair of the Board.

Implementation

An employee who believes they are the subject of a Reprisal should notify the Director of People and Culture immediately. Where a manager or supervisor is informed of, or becomes aware of, a reprisal, the manager or supervisor should notify the Director of People and Culture immediately. If the complaint involves the Director of People and Culture or a member of the Board of Directors, the reprisal shall be reported to the Chief Executive Officer. If the Reprisal involves the Chief Executive Officer, the employee, manager or supervisor will notify the Director of People and Culture, who shall confer with the Board Chair.

Any allegation of reprisal will be reviewed and may be the subject of a formal investigation. Toronto Seniors Housing Corporation will determine who will lead the investigation, and the persons to be consulted, based on the subject matter at issue.

Investigations may be conducted by an external investigator if necessary and at the discretion of Toronto Seniors Housing Corporation.

The Director of People and Culture will determine what, if any steps are appropriate to stop, reverse, or remedy a reprisal. For complaints involving the Director of People and Culture, the Chief Executive Officer will determine what, if any steps are appropriate to stop, reverse, or remedy a reprisal. For complaints involving a member of the Board of Directors, the Chief Executive Officer in consultation with the Board Chair (or Vice-Chair if the complaint is against the Chair) will determine what, if any steps are appropriate to stop, reverse, or remedy a reprisal. For complaints involving the Chief Executive Officer, the Board Chair, in consultation with the Director of People and Culture, will determine what, if any steps are appropriate to stop, reverse, or remedy a reprisal. The Board Chair will inform the Board of Directors unless there are extenuating circumstances or where the integrity of the investigation might be compromised during the investigation process.

Once the Toronto Seniors Housing Corporation has provided an assurance of

confidentiality to a whistleblower, the individual's identity cannot be revealed without the individual's consent.

Toronto Seniors Housing Corporation's commitment to provide reasonable protection for whistleblowers will include:

- Taking all reasonable efforts to protect the identity of all individuals involved in an investigation, including the identity of an individual alleging wrongdoing and the identity of an individual alleged to have committed wrongdoing, to the fullest extent possible. All information collected under this Policy or through subsequent investigations shall be held in confidence, except where disclosure may be necessary to further the investigation, or as required by law.
- Taking all reasonable efforts to protect the identities of whistleblowers by not sharing a whistleblower's identity, or information that could reasonably be expected to reveal the whistleblower's identity, with others, including a law enforcement agency without the whistleblower's explicit consent.
- Respecting the decision of the whistleblower as to how much personal information will be provided.
- Adhering to Canada's Criminal Code which means Toronto Seniors Housing Corporation cannot dismiss, suspend, demote, discipline, harass, or otherwise disadvantage whistleblowers, or deny them a benefit of employment when the information provided was given in good faith and that was reasonably believed to be true and accurate.

Compliance and Monitoring

Toronto Seniors Housing Corporation will not tolerate wrongdoing or reprisals against anyone who reports wrongdoing, and all employees have a duty to report suspected wrongdoing. No employee or member of the Board of Directors will take any action in reprisal against a Whistleblower for making, or being suspected of making, a report of wrongdoing under this Policy. No employee or member of the Board of Directors will take any action in reprisal against any person who participates in an investigation under this Policy.

An employee who is found to have engaged in reprisal prohibited by this Policy shall be the subject of discipline, up to and including dismissal for cause.

Reprisal by a member of the Board of Directors shall be treated in the same manner as a violation of the Code of Ethics and Conduct for the Board of Directors. Conduct prohibited by this Policy, which is contrary to legislation, including that of a criminal nature, may be addressed or reported accordingly.

An employee who knowingly makes a false or misleading report under this Policy, or who knowingly makes a false or misleading statement in an investigation under this Policy, may be the subject of discipline, up to and including dismissal for cause.

Employees and other persons are expected to co-operate fully in an investigation under this Policy.

Employees who improperly breach confidentiality will be subject to legal action or disciplinary action up to and including dismissal as determined by the Chief Executive Officer.

Employees who are contacted by the media regarding an investigation under this Policy must refer all inquiries to the Communications team. For further information, please see the Media and Issues Protocol.

The Chair of the Audit, Finance and Risk Management Committee (AFRC) and the Finance Team shall be informed of any allegation of fraud involving an employee or member of the Board of Directors of the Toronto Seniors Housing Corporation in order to satisfy audit requirements.

Related Legislation, Regulations, and TSHC Policies:

- *Ontario Employment Standards Act*
- *Ontario Human Rights Code*
- *Occupational Health and Safety Act*
- *Criminal Code of Canada*

- TSHC Employee Code of Conduct
- TSHC Employee Conflict of Interest Policy
- TSHC Fraud Prevention Policy
- TSHC Board of Directors Code of Ethics and Conduct
- TSHC Board of Directors Reimbursement Policy
- TSHC Finance Policies

Amendments (Revision History):

Initial policy approved by Board of Directors on April 28, 2022

Policy reviewed on January 16, 2025, with the following revisions, and approved by the Board of Directors on XXXX XX, XXXX:

- conversion to standard TSHC policy format
- title change from “Whistleblower Policy” to “Whistleblower Protection Policy”
- addition of the ethics reporting/whistleblowing solution that is currently in place for Toronto Community Housing Corporation and TSHC
- addition of TSHC commitment and shared values sections
- minor revisions to clarify roles and responsibilities of employees and managers
- assignment of next review cycle (three years)

Next Scheduled Review Date: 2028

This Policy will be reviewed once every three years.

Policy Contact

Director, People and Culture

Appendices

- Frequently Asked Questions (under review)
- TSHC Media and Issues Protocol

Toronto Seniors Housing Corporation (TSHC) Fraud Prevention Policy

Policy Sponsor: Finance Lead

Approver: Board of Directors

Initial Approval Date:

Effective Date: February 26, 2025 (pending approval)

Policy Statement

This Policy has been established as part of the Toronto Seniors Housing Corporation's (TSHC's) controls to assist in the prevention and detection of fraud. The Policy sets out responsibilities for reporting suspected fraud and provides guidelines for the conduct of investigations.

TSHC is committed to protecting its revenue, property, information, reputation and other assets from attempts, by those working for, or on behalf of TSHC, to improperly gain either financial or other benefits to the detriment of TSHC or its interested parties. TSHC requires its employees to act with personal integrity, ethics, honesty, and diligence in performing duties, and to safeguard the assets of the corporation. All employees have an obligation to immediately report any activity by a colleague, contractor, or tenant that appears to violate applicable laws, rules, regulations, TSHC Codes of Conduct or policies. This includes neither facilitating or ignoring current and/or past incidents of suspected fraud when identified. Fraud or misuse of TSHC assets will not be tolerated.

TSHC is committed to promoting integrity, ethics, accountability, and transparency, as well as maintaining an environment where people can raise concerns without fear of reprisal. TSHC is also committed to enhancing public trust and confidence in TSHC. TSHC will investigate all allegations of fraud or corruption, including but not limited to tenant misuse of TSHC Community Activities Funds and Rent-Geared-to-Income (RGI) fraud.

Every reasonable effort will be made to recover any gains obtained by, or receive

compensation for any damages to TSHC caused by, fraud or misuse. Actions will be taken to deal with those who defraud TSHC or who are found to be corrupt.

TSHC will follow the protocol for housing providers, referenced in the City of Toronto's Rent-Geared-to-Income (RGI) Administration Manual, when instances of fraud by RGI households are identified or comes to the attention of TSHC.

Policy Objectives

This Policy provides a framework within which TSHC can meet the following objectives:

- Take appropriate measures to prevent, detect and investigate fraudulent activities and other acts of misconduct.
- Provide staff and the public with an anonymous reporting channel when fraud or corruption is suspected, by implementing an ethics hotline.
- Provide guidelines and delineate responsibilities for investigations.
- Manage claims diligently with respect and discretion.

Scope

This policy applies to all current and former members of the Board of Directors, employees (whether they work on a full-time or temporary basis), volunteers, contractors, agencies, and organizations working for TSHC.

Out of Scope

This Policy covers matters that are in the public interest and for which there are no existing processes or mechanisms for reporting and investigation. For example, it is not intended to address matters through existing procedures where corporate policy and/or collective agreements (if applicable) are generally available to address individual complaints by employees of workplace discrimination or harassment.

Disclosures of fraud (that are not investigated or addressed under the Fraud Prevention Policy) will be referred to the appropriate investigator and/or

investigated in accordance with the provisions of TSHC'S Whistleblower Protection Policy.

Definitions

Anonymous reporting channel: is a secure, anonymous and confidential way to raise concerns or report fraud or unethical behaviour to TSHC. Reports involving employees or members of the Board of Directors will be received by the Director, People and Culture. Where the Director, People and Culture is implicated in an allegation the report will be received by the Chief Executive Officer. For more information on how to report possible fraud to the anonymous hotline please refer to the Frequently Asked Questions document.

Contractor: Any person or entity, including their employees, that have been contracted, sub-contracted, or otherwise engaged to supply goods or services to the TSHC including a vendor, supplier, consultant, or service provider.

Fraud: A dishonest act that results in actual loss or risk of loss, deception, misappropriation of resources or the manipulation of data to the advantage or disadvantage of a person or entity. Fraud includes any misuse, or attempt to misuse:

- One's position in the company, and/or
- TSHC asset or TSHC property for personal gain or purposes unrelated to company business.

Fraud includes corruption. Corruption is defined as offering, giving or soliciting, or accepting of an inducement or reward that may improperly influence the action of a person or entity.

Examples include, but are not limited to:

- Forgery or alteration of cheques, drafts, promissory notes, securities records, documents, or other similar instruments.
- Obtaining company funds or compensation through dishonesty.
- Falsifying accounts, records (including expense claims and time sheets), or

other documents required for any accounting purpose with a view to personal gain, or gain for another, any claim for reimbursement of expenses that are not made for the exclusive benefit of TSHC, or any irregularity in the handling or reporting of money transactions.

- Unauthorized use or misuse of TSHC property (including equipment, materials, or records and proprietary or confidential information) and time.
- Any computer-related activity involving the alterations, destruction, forgery, or manipulation of data for fraudulent purposes or misappropriation of TSHC or Toronto Community Housing Corporation owned software.
- Profiteering as a result of insider knowledge of company activities.
- Violation of procurement policy or procedures.
- Improper dealings with tenants, vendors or agencies.
- Taking or diverting property, information or other assets belonging to TSHC or other parties (including tenants) through fraud, deception, extortion or other illegal means.
- Intentionally destroying or defacing TSHC property or assets, or disclosing confidential information to outside parties.
- Acts of bribery, which can include acceptance of secret commissions, seeking or accepting anything of material or personal value from vendors, consultants, or contractors doing business with TSHC, or from tenants or applicants for housing with TSHC (such as provision of an unauthorized benefit to a tenant including, but not limited to, an unauthorized reduction of the rent payable by a tenant, unauthorized internal transfers to another unit or unauthorized determination of eligibility for rent-geared-to-income assistance).
- Exercising authority or influence over a matter where a conflict of interest exists, including violations of TSHC's Employee Conflict of Interest Policy, TSHC's Board of Directors Conflict of Interest Policy, or violation of the conflict of interest provision in the *Housing Services Act*.
- Conspiracy, to commit fraud with others.
- Any similar or related irregularities.

This Policy also applies to:

- Stealing or removing company assets (theft), any misappropriation of funds, securities, supplies, furniture, fixtures, equipment, software or other assets, and
- Extortion, such as threatening action, unless some benefit is received.

Good faith: means an act which is not done trivially, frivolously, or for a vexatious purpose.

Investigator: A staff person or external resource that completes a structured, fact-finding inquiry regarding a fraud, waste, or misuse claim.

Manager: The supervisor or manager to whom an employee normally reports; or in the case of a disclosure of fraud involving the supervisor or manager to whom an employee normally reports, the next-above supervisor or manager in the employee's chain of command.

Property: TSHC owned, controlled, leased or operated facilities, materials, resources, and assets, including (but not limited to) buildings, land, money, vehicles, phones, phone system, records, files, documentation, office equipment, cell phones, pass cards, computers, computer tools and network, supplies, cheques, and equipment.

Reprisal: Actions taken against another person as a direct result or in retaliation for making a report under this Policy, being suspected of making a report under this Policy, or participating in an investigation under this Policy. Examples of reprisal include but are not limited to:

- coercion
- demotion
- discipline
- discrimination
- dismissal
- harassment
- intimidation
- suspension
- termination

In the case of an employee, reprisal could include any other action which adversely affects their working conditions, or a threat to take any such actions and knowingly directing or counselling of another person to engage in reprisal.

Recovery: The process of attempting to obtain compensation to the Corporation for financial losses caused by proven acts of fraud and misuse.

Risk: the likelihood that there will be a positive or negative deviation from the expected objective. Risks can be threats or opportunities and are measured by likelihood or probability of occurrence and the impact or consequences should they occur.

Whistleblower: An employee, member of the Board of Directors, or tenant, who, in good faith and with reasonable belief that wrongdoing has occurred, makes a report under this Policy or TSHC's Whistleblower Protection Policy.

Wrongdoing: in this Policy, refers collectively to any serious act (or failure to act) that is covered by this Policy and which:

- constitutes fraud or waste of TSHC resources or assets as defined under this Policy
- is a violation of TSHC's policies, procedures, or directives
- risks the health or safety of tenants, employees, or visitors to TSHC sites
- is unlawful under any municipal, provincial or federal laws
- knowingly directs or counsels another person to engage in such acts
- is designed or intended to conceal conduct prohibited under this Policy

Roles and Responsibilities

TSHC's Chief Executive Officer is responsible for:

- Delegating key responsibilities for the administration of this Policy.
- Leading and advancing a culture rooted in the highest ethical standards for TSHC employees.
- Ensuring TSHC employees understand their ethical rights and responsibilities, including their responsibilities under this Policy, and other TSHC policies

including Employee Code of Conduct and Employee Conflict of Interest.

- Investigating or referring responsibility to TSHC staff to investigate alleged fraud, and ensure these investigations are appropriately conducted.
- Implementing corrective actions to strengthen management oversight and make improvements to internal control systems and procedures based on findings.
- Informing the Chair of the Audit, Finance and Risk Committee of any allegation of fraud involving an employee or member of the Board of Directors of TSHC.
- Ensuring recommendations made by an investigator in their report addressing fraud are implemented on a timely basis including identified systemic issues.

TSHC's Managers/ Department Directors are responsible for:

- Promoting ethical conduct and supporting ethical decision-making in their areas of responsibility.
- Ensuring TSHC employees understand their ethical rights and responsibilities, including their responsibilities under this Policy, and other TSHC policies including Employee Code of Conduct and Employee Conflict of Interest.
- Assisting employees in the administration, interpretation and application of this Policy, where applicable.
- Instituting and maintaining a system of internal control to provide reasonable assurance for the prevention and detection of fraud, misappropriation, and other irregularities.
- Being familiar with the types of improprieties that might occur within their area of responsibility and be alert for any indicators of such conduct.
- Ensuring that TSHC employees under their supervision, who in good faith, report fraud are protected from reprisals in accordance with this Policy and TSHC's Whistleblower Protection Policy.
- Immediately reporting allegations of fraud, upon notification from an employee of suspected fraud, or if they have reason to suspect that a fraud has occurred, to the Director of their Department, or to the Chief Executive Officer if the Director of their Department, Director, People and Culture, or Finance Lead are implicated in the allegation.

TSHC's employees and contractors are responsible for:

- Acting honestly and with integrity, protecting company assets and observing internal controls to safeguard assets.
- Understanding and adhering to this Policy, the procedures and associated documentation.
- Certifying their receipt and review of this Policy. Existing employees will be required to certify their receipt and review of this Policy every year.
- Immediately notifying, in good faith, their manager, Director of their Department, or reporting to the ethics hotline (anonymous reporting channel) if they suspect or have knowledge of any occurrence of irregular conduct, fraud, corruption, or have reason to suspect that a fraud has occurred. Employees are encouraged to raise incidents or suspected incidents with their immediate supervisor or manager. However, employees may remain anonymous when reporting suspected fraud. TSHC uses an independent service provider for a secure, anonymous and confidential way (through the reporting channel) to raise concerns or report unethical behaviour to TSHC.
- Immediately notifying, in good faith, the Chief Executive Officer if they suspect or have knowledge of any occurrence of fraud involving the Director of their Department, Finance Lead, or Director, People and Culture.
- Immediately notifying, in good faith, the Director, People and Culture, if they suspect or have any knowledge of any occurrence of fraud involving the Chief Executive Officer.
- Employees who are proven to knowingly make false allegations or who fail to report serious irregularities will be subject to discipline up to and including dismissal.
- Co-operating fully, if required, in an investigation under this Policy, and will make all reasonable efforts to be available to assist with the investigation.
- Maintaining confidentiality. Employees shall not attempt to investigate suspected fraud or discuss the matter with anyone other than a person to whom the fraud was reported, TSHC staff conducting the investigation, the police, and any other resources deemed necessary. Employees who improperly breach confidentiality will be subject to legal action or disciplinary

action up to and including dismissal as determined by the Chief Executive Officer or their designate.

- Directing individuals who want to report possible fraud or misuse to the hotline or appropriate staff person.
- Immediately notifying the Director, People and Culture if they believe they are the subject of a Reprisal, following a disclosure of fraud. An employee informed of, or who becomes aware of, a Reprisal against an employee has a duty to notify the Director, People and Culture, or Chief Executive Officer so that they will undertake to ensure that the employee is protected from any further reprisal. For more information, please see TSHC's Whistleblower Protection Policy.

TSHC's Finance Lead is responsible for:

- Providing overall direction on the implementation of this Policy.
- Investigating or referring responsibility to appropriate investigator to investigate alleged fraud, and ensure these investigations within scope of this Policy are appropriately conducted.
- Referring allegations that do not constitute fraud under this Policy to the appropriate contact or investigator for investigation and/ or appropriate action.
- Consulting with the Director, People and Culture, legal counsel, Chief Executive Officer, or their delegates, as appropriate.
- Implementing corrective actions to strengthen management oversight and make improvements to internal control systems and procedures based on findings to prevent future occurrences and minimize risk.
- Informing the Chair of the Audit, Finance and Risk Committee of any allegation of fraud involving an employee, contractor, member of the Board of Directors, or tenant of TSHC.
- Informing the Director, People and Culture of allegations of fraud in a timely manner. If the complaint involves the Director, People and Culture, or a member of the Board of Directors, then the Chief Executive Officer shall be informed. If the report involves the Chief Executive Officer, the Finance Lead

will notify the Director, People and Culture, who shall confer with the Board Chair.

TSHC's Director, People and Culture is responsible for:

- Undertaking preliminary review of allegations of fraud and corruption, and applying the Fraud Prevention Policy definitions, that they receive to determine next steps for allegation in accordance with related procedure.
- Investigating or referring responsibility to an investigator to investigate allegation, and ensuring the responsibility for investigations to be appropriately conducted remains with Finance Lead, or Chief Executive Officer if Finance Lead is implicated in allegation.
- Providing oversight, if required, of alleged fraud investigations led by the investigator. The responsibility to ensure such investigations are appropriately conducted remains with the Finance Lead, or Chief Executive Officer if Finance Lead is implicated in allegation.
- Ensuring that employees who, in good faith, report wrongdoing are protected from reprisal in accordance with TSHC's Whistleblower Protection Policy.

TSHC's Board of Directors Members are responsible for:

- Understanding and adhering to this Policy, as well as the Board of Directors Code of Ethics and Conduct and Board of Directors Conflict of Interest Policy.
- Immediately notifying the Board Chair if they suspect or have knowledge of any occurrence of fraud.
- Immediately notifying the Vice-Chair of the Board if they suspect or have knowledge of any occurrence of fraud involving the Board Chair.

TSHC's Board of Directors Chair is responsible for:

- Consulting with the Director, People and Culture on the appropriate actions to take when any occurrence of fraud by Chief Executive Officer is reported. The Board Chair will inform the Board of Directors unless there are extenuating circumstances or where the integrity of the investigation might be compromised during the investigation process.

TSHC's Audit, Finance and Risk Committee is responsible for:

- Overseeing management's establishment of an adequate system of internal controls, and procedures and review and monitoring of effective performance of those internal controls and procedures

TSHC's Director, Operations is responsible for:

- Receiving claims of fraud and misuse regarding tenants, (received through the ethics hotline, staff, or tenants).
- Ensuring claims of RGI fraud received and identified by TSHC follows the City of Toronto's Rent-Geared-to-Income Administration Manual protocol for documenting and reporting suspected fraud.
- Redirecting claims of fraud related to the Community Activities Fund to the Manager, Community Programs and Partnerships for investigation

Policy Content

Investigation Guidelines

All investigations will be conducted in accordance with the principles of natural justice.

All investigations will be conducted in the strictest of confidence in an objective and impartial manner.

TSHC will investigate, in a timely manner, any suspected acts of fraud or corruption, misappropriation, or other similar irregularity. An objective and impartial investigation will be conducted regardless of the position, title, and length of service or relationship with TSHC of any party who is, might be or becomes, the subject of such investigation. Investigations may include the participation of Toronto Police Services, management representatives from Finance, and/or People and Culture Departments, or any other resources deemed necessary.

Any unionized employee against whom allegations are made will be given

opportunity for union representation, as per collective agreement provisions.

Confidentiality

All participants aware of or participating in an internal investigation shall keep the details and results of any investigation confidential. Particulars of the investigation with potential witnesses may be disclosed only if such disclosure would further the investigation and only after consultation with legal counsel and labour relations (as applicable). Throughout the investigation, TSHC Department Directors who have a legitimate need to know will be informed of pertinent investigative findings. To the extent possible by law, the identity of individuals involved in an investigation including the identity of an individual alleging fraud and the identity of the individual alleged to have committed fraud will be protected.

Whistleblower Protection

No person acting on behalf of TSHC, including the Board of Directors shall:

- dismiss or threaten to dismiss an employee
- discipline or suspend, or threaten to discipline or suspend, an employee
- discriminate or harass an employee
- demote an employee
- impose any penalty or reprisal upon an employee
- intimidate or coerce an employee because the employee has acted in accordance with the requirements of the policy

Violation of this section may result in discipline up to and including dismissal.

Actions Following an Investigation

TSHC will pursue every reasonable effort, including court ordered restitution, and/or civil judgments, to obtain recovery of the company losses.

At the discretion of the Chief Executive Officer or their designate, those found to be directly responsible for fraud or corruption will be subject to any or all of the

following:

- the requirement to make full restitution of all direct and related costs
- referral to police and prosecution, as may be applicable
- discipline that may include termination of employment with TSHC

Media Inquiries

Any staff person or member of the Board of Directors who are contacted by the media regarding an investigation under this Policy must refer all inquiries to the Communications team. For further information, please see the Media and Issues Protocol.

Compliance and Monitoring

If there are any allegations of fraud involving a TSHC employee or member of the Board of Directors, covered by this Policy, the Finance Lead shall prepare a quarterly report to inform the Chair of the Audit, Finance and Risk Committee.

Related Legislation, Regulations, and TSHC Policies:

- *Criminal Code*
- *Housing Services Act*
- TSHC Employee Code of Conduct
- TSHC Employee Conflict of Interest Policy
- TSHC Board of Directors Code of Ethics and Conduct
- TSHC Board of Directors Conflict of Interest Policy
- TSHC Procurement Policy and Procedures
- TSHC Board of Directors Reimbursement Policy and Procedures
- TSHC Finance Policies
- TSHC Media and Issues Protocol
- Unions' collective agreements

Amendments (Revision History):

Initial policy approved by [approver] on [date].

Next Scheduled Review Date: 2028

This Policy will be reviewed once every three years.

Policy Contact

Finance Lead

Appendices

- Frequently Asked Questions (under review)
- TSHC Media and Issues Protocol

Toronto Seniors Housing Corporation
Audit, Finance, and Risk Committee (AFRC) Meeting

Meeting Date: January 30, 2025

Item Number: 11

Report Name: Procurement Change Orders

To: Audit, Finance, and Risk Committee

From: Vince Truong, Finance Lead (I)

Date of Report: January 30, 2025

Purpose:

The purpose of this report is to provide a recommendation regarding the approval of the Procurement Change Orders.

Recommendation:

It is recommended that AFRC approve and recommend to the Board of Directors to adopt the following resolution:

Approve the following change orders which the cumulative change order for direct awards value exceeds 20% of the original commitment value of the contract:

- a) Toronto Community Housing Corp (TCHC) – Service Delivery Agreement fee extension to February 2026 in the amount of \$12,026,279;

- b) Rivint Interpretation and Translation Services – Multilingual interpretation and translation services extension to March 31, 2026 in the amount of \$25,000.

Reason for Recommendation:

Subject to the Procurement Method Delegation of Authority that applies to all standard and non-standard contracts, the Board or Board Committee as appropriate shall approve all direct award, invitation and open competitive processes, where the cumulative change order value exceeds the greater of \$250K or 20% of the original commitment value, or to extend the term of the contract.

For TCHC Service Delivery Agreement (SDA), the original amount was for 2022, however, since there was no Lease Agreement in place as of January 2023, and the direction from the City to share resources with TCHC, the SDA needed to be extended in the amount of \$12,026,279 ending in February 28, 2026. The Transition and Service Delivery Agreements have both been approved by the Board of Directors in June 2022.

For Rivint Interpretation and Translation Services, TSHC requires an extension and the continuity of the multilingual interpretation and translation services, as part of the multi-year agreement ending in 2026.

Please see the attached file for further information.

Name: Vince Truong

Title: Finance Lead (I)

List of Attachments:

Attachment 1: Procurement Change Orders

Attachment 1: Procurement Change Orders									
Item	Vendor	Goods/Services Description	Business Unit	Original Commitment Value	Individual Amount of Change Order	Cumulative Total of Change Order	Cumulative Change Order % of Original Commitment Value	Contract Term	Reasons for Change Order
1.	TCHC	Service Delivery Agreement (SDA) Fee	Finance	\$4,674,000.00	\$12,026,279.00	\$34,705,397.00	742.50%	Feb/2025 to Feb/2026	This project is directed by the City of Toronto, in its capacity as Toronto Community Housing Corporation (TCHC) and Toronto Seniors Housing Corporation (TSHC) sole shareholder which has transferred its seniors' portfolio, therefore, the associated shared services which is unique to the portfolio is contracted to TCHC and the continuation of shared services can only be delivered by TCHC.
2.	Rivint Interpretation and Tralation Services	Multilingual Interprestation Services	Engagement, Partnership and Communications	\$25,000.00	\$25,000.00	\$25,000.00	100.00%	March/2025 to March/2026	Rivint Interpretation and Translation Services was awarded the contract back in 2023, through an open competitive procurement process. Procurement issued a PO for the initial year of the contract, with the remaining 3 optional 1-year term to 2026. TSHC is extending a 1-year term to the contracted vendor for continuation of services.

Toronto Seniors Housing Corporation
Audit, Finance, and Risk Committee (AFRC) Meeting

Meeting Date: January 30, 2025

Item Number: 12

Report Name: 2025 TSHC Operating Budget

To: Audit, Finance, and Risk Committee

From: Vince Truong, Finance Lead (I)

Date of Report: January 30, 2025

Purpose: The purpose of this report is to provide an update on financial matters.

Recommendation:

It is recommended that the AFRC receive this report for information.

Reason for Recommendation:

The first draft of the 2025 Budget was submitted to the City of Toronto on September 10th as a stand-alone budget for Toronto Seniors Housing Corporation (TSHC). The preliminary budget reflects the following:

- Discussions with Directors, Managers, staff, and tenants,

- Request for additional staff to support tenant-facing operations and corporate requirements,
- Maintaining existing services,
- Consideration of key cost drivers such as inflation,
- Impact in operations including salary, collective agreements, and other expected changes.

Both the City and TSHC are expected to face significant budget pressures with the 2025 Budget. TSHC has developed the budget with a focus on key priorities and to manage expectations including supporting the 2023-2025 Strategic Directions. This has also included consultation with tenants and the Senior Tenants Advisory Committee (STAC), where valuable input on tenant priorities was received.

Additional changes since the first draft include:

- Adjusted professional services and consultation to support ongoing business requirements,
- Amended legal services and right-sized requirements for future contracts,
- Found efficiencies and savings through reducing courier services, and using mail, and other reductions in office expenses,
- Modified insurance cost with actual renewal rate,
- Adjustments per City objectives to align with budgetary requirements,
- Other refinements that have little or no major impact on tenant-facing operations.

Since the last update on November 28th to the AFRC, the TSHC Board approved the 2025 Operating Budget on December 16th (see

attachment 1). The 2025 Operating Budget deficit of \$3.597M is expected to be funded through the 2024 TSHC surplus.

The final 2025 TSHC Budget Notes (see attachment 2) was completed in early January 2025. TSHC met with the City's Budget Committee on January 15th for a Questions and Answers session, that included a formal presentation from TCHC. TSHC staff were also present during the Mayor's Town Hall Telephone Conference on January 16th for input from the residents on the 2025 Budget.

The remaining tasks include the formal release of the 2025 City of Toronto Budget from the Mayor's Office on February 1st, and the approval of the 2025 Budget on February 11th by City Council.

The Board will be updated on February 26th on the final 2025 Budget, and subsequent budget details will be released to the public.

Name: Vince Truong

Title: Finance Lead (I)

List of Attachment:

2025 TSHC Operating Budget (Attachment 1)

2025 TSHC Budget Notes (Attachment 2)

Toronto Seniors Housing Corporation (TSHC)

(Amounts in \$000's)

	2025 BUDGET	2024 FORECAST	2024 BUDGET	2025B vs 2024F		2025B vs 2024B	
	TSHC	TSHC	TSHC	\$	%	\$	%
CASH INFLOWS							
Residential rent (RGI and Market)	92,456	91,784	87,691	672	1%	4,764	5.4%
Subsidies - City Investment	47,970	43,908	44,682	4,061	9%	3,287	7.4%
Other Revenue	1,485	1,611	157	(126)	-8%	1,328	845.2%
	141,910	137,303	132,531	4,607	3.4%	9,379	7.1%
CASH OUTFLOWS							
Utilities	24,173	22,502	23,040	(1,671)	-7%	(1,133)	-4.9%
Mortgage Interest & Principal	30,362	28,888	29,414	(1,473)	-5%	(948)	-3.2%
Other TCHC Allocated Operating Costs	43,179	37,351	40,938	(5,828)	-16%	(2,241)	-5.5%
Total TCHC Direct Expenditure	97,714	88,742	93,392	(8,973)	-10%	(4,322)	-4.6%
Total TSHC Direct Expenditure	47,793	44,553	43,480	(3,240)	-7%	(4,313)	-9.9%
Total Expense	145,507	133,295	136,872	(12,212)	-9.2%	(8,636)	-6.3%
Total Cash Surplus / (Shortfall)	(3,597)	4,008	(4,341)	(7,605)		744	
Adjustments with TCHC			4,341				
2024 TSHC Surplus Reserve	3,597						
Total Cash Surplus / (Shortfall) after Adjustments	-		-				

2025 Budget Notes

Toronto Seniors Housing Corporation

While we aim to provide fully accessible content, there is no text alternative available for some of the content within these pages. If you require alternate formats or need assistance understanding our charts, graphs, or any other content, please contact us at FPD@toronto.ca.

Description

Toronto Seniors Housing Corporation's vision is to provide safe, diverse, and vibrant communities where tenants have a sense of inclusion and well-being.

Toronto Seniors Housing Corporation manages 83 buildings with almost 14,000 units, for about 15,000 low and moderate income seniors aged 59 and older.

Our core business is to provide clean, safe, and affordable social housing in well-maintained buildings. Our value add is that we provide access to improved health, wellness, and social supports for tenants.

Why We Do It

Toronto Seniors Housing Corporation (TSHC) is committed to being a leader in the delivery of safe, affordable housing for seniors. Our mandate is to enable TSHC tenants to age at home in comfort and dignity with access to programs and services and with a voice in their community.

We provide tenants with access to supports to live independently so they can age in their homes and communities while enjoying a better quality of life. With a focus on the unique needs of seniors, our commitment includes engaging and collaborating with tenants, staff and partners towards providing excellent service for the well-being of tenants.

The City of Toronto aims to deliver these outcomes equitably, efficiently and with excellent customer service to help improve the lives of Torontonians and work to earn their trust and confidence.

For further information about Toronto Seniors Housing Corporation, please visit: www.torontoseniorshousing.ca

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What Service We Provide

Deeply Affordable Housing

The majority of TSHC's 15,000 tenants benefit from the Rent-Geared-to-Income (RGI) program that offers deeply affordable housing for close to 97% of units.

Housing and Support for Seniors

The Corporation provides tenants with access to support and services to live independently, so they can age in their homes and communities while enjoying a better quality of life.

Toronto Seniors Housing Corporation also has an emphasis on providing tenancy support and individualized solutions through our Complex Tenancy Team, for tenants experiencing acute challenges to maintaining their tenancies.

Community Programming for Seniors

Toronto Seniors Housing Corporation has a focus to facilitate access to program and services that tenants need and want, including coordinating of a blend of social recreation and wellness programming, tenant and agency led, along with events and equipment to support community building.

Who We Serve

The Corporation's tenants are from all walks of life, with a primary eligibility being low-income, survivors of domestic violence or human trafficking, shelter residents, and applicants experiencing homelessness.

Notable statistics about tenants include:

- 77% of TSHC tenants live alone
- 71% of TSHC tenants are aged 65-84, and almost 18% are 85 and older
- 44% of TSHC households* have indicated a preferred spoken language that was not English

*Calculated by 'Head of Household' language preference, as a percent of the households that provided preference; 25% of households have not provided a preferred spoken language.

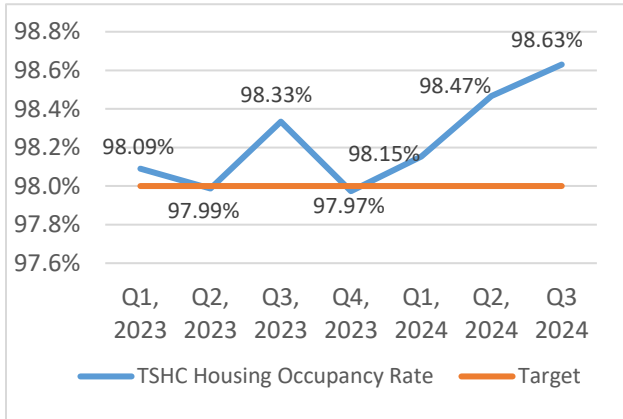
How Much Resources (gross 2025 operating budget): \$145.5 Million

Budget at a Glance

2025 OPERATING BUDGET				2025 - 2034 10-YEAR CAPITAL PLAN			
\$Million	2025	2026	2027	\$Million	2025	2026-2034	Total
Revenues	\$145.4	\$143.3	\$144.7	This program does not have a 10-Year Capital Budget and Plan.			
Gross Expenditures	\$145.5	\$151.7	\$158.0				
One-Time Funding	\$ 0.1						
Net Expenditures	\$ 0.0	\$ 8.4	\$ 13.3				
Approved Positions	330.5	334.5	338.5				

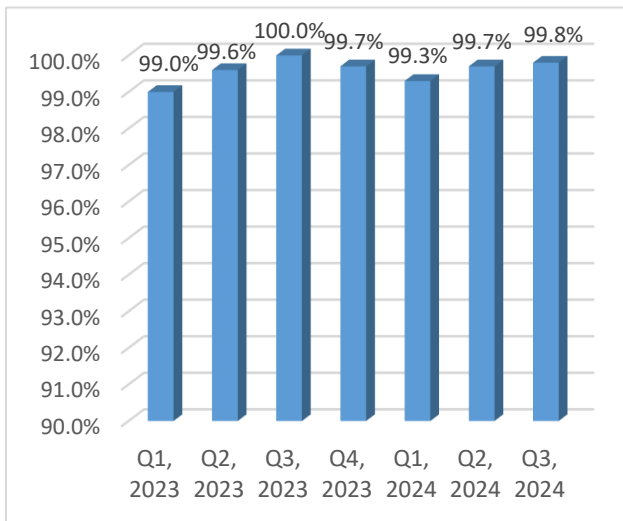
How Well We Are Doing – Behind the Numbers

Deeply Affordable Housing - Housing Occupancy Rate



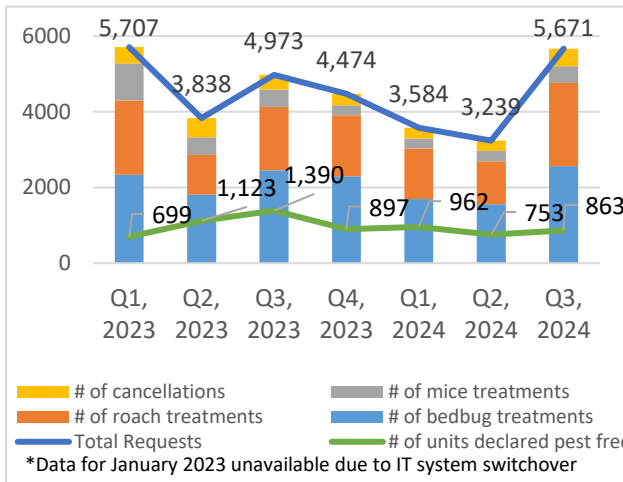
- Maintaining a high housing occupancy rate is essential to ensure rentable RGI units are available and to support movement on the centralized waiting list.
- Average housing occupancy rate for first through to the third quarter of 2024 is 98.4%, surpassing the target rate of 98%.
- Average unit turnover days was at 57 days in the second quarter and 44 days in third quarter, well below the year-to-date sector average (at the third quarter) of 81.3 days.
- Toronto Seniors Housing Corporation actively supports the City's Rapid Rehousing Program which brings in approximately 200 tenants to TSHC annually.

Deeply Affordable Housing – Rent Collection Rate



- Compliance in rent collection enables TSHC to maintain and improve housing quality while supporting senior tenants effectively.
- With the implementation of TSHC's Arrears Collection Process, the goal is to resolve arrears as early as possible by connecting tenants with the necessary supports to establish stable tenancies and managing arrears by working with tenants to enter into successful repayment agreements.
- Toronto Seniors Housing Corporation has consistently maintained high rent collection rates in 2024, with an average of 99.6%, exceeding the sector average (at the third quarter) of 94.5%. The arrears level has remained stable in 2024 (up to the third quarter), with 90% of households maintaining good financial standing. The majority of households in arrears fell within the \$1 - \$2,000 range.

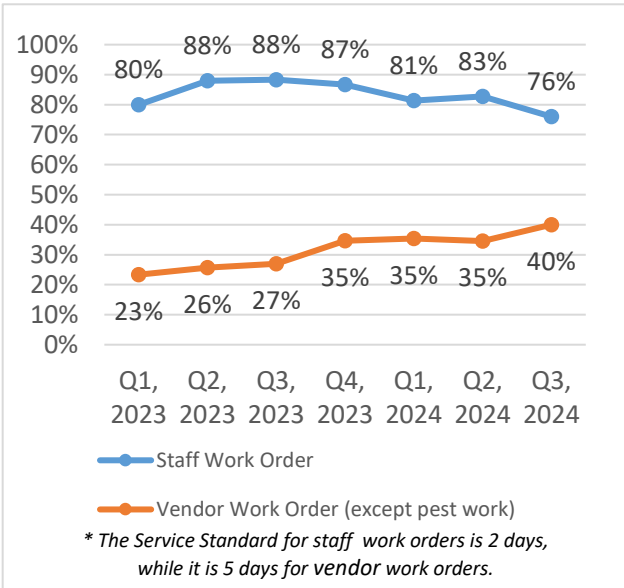
Stewardship of Public Asset - Pest Management



- Effective pest management enhances the overall living conditions, contributing to a safe and comfortable living environment for senior tenants.
- Year to date (through to the third quarter) a total of 12,494 pest treatment requests have been processed. In the most recent quarter (third quarter), 863 units were declared pest free after the treatments.
- The Environmental Health Unit staff support tenants with known unit preparation challenges before and after pest treatment. There have been 63 staff assisted preparations for the first through to the third quarter.
- Treatments are subject to seasonal fluctuations and Annual Unit Inspections.

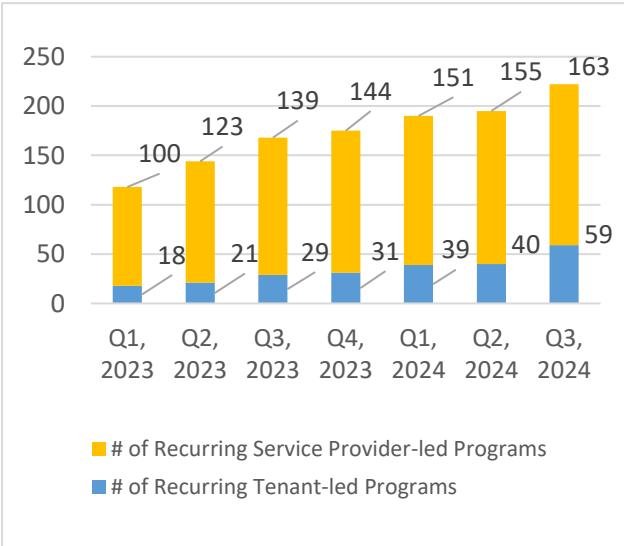
How Well We Are Doing – Behind the Numbers

Stewardship of Public Asset - Work Order Completed within Service Standard



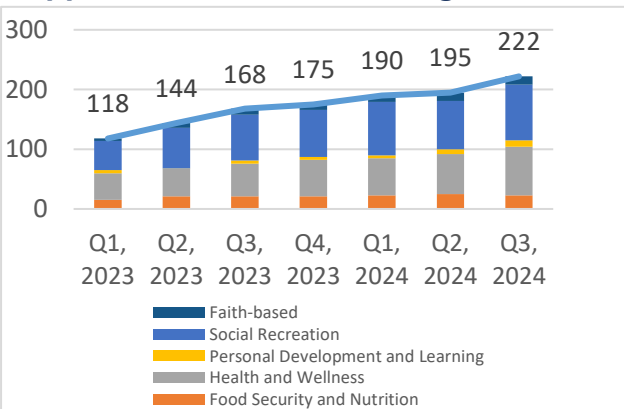
- Promptly addressing maintenance requests ensures that buildings are clean and well-maintained and promotes a safe living environment for senior tenants to enjoy their homes. From the 2023/2024 Tenant Experience Survey, more than 4 in 5 (85%) tenants feel that their building is generally well-maintained.
- The percentage of work orders completed within Service Standards remained steady through the first to the third quarter 2024, where staff achieved an average rate of 80% compliance and vendors achieved 37% compliance. The majority of internal (non-vendor) work orders continue to be consistently related to janitorial, plumbing, alarm monitoring, electrical, and doors; and the majority of vendor work orders are related to pest control, plumbing, appliances, doors, and elevators.
- Seventy five per cent (74%) of surveyed tenants, who requested maintenance or repair service, felt that the work was completed quickly, and 75% were happy with how well the work was done.

Support of Seniors – Recurring Programs for Seniors



- Programs are vital for senior tenants as they cater to their unique needs and contribute to their overall quality of life. Over the last three quarters we have seen consistent numbers of recurring programming offered to seniors living in TSHC units. Additionally, the number of tenant-led programs has expanded compared to the previous year.
- Over half (55%) of tenants surveyed (2023/2024) felt that there is a sense of community in their building. This is an important driver of overall satisfaction. Areas for improvement include enhancing program offerings at buildings and creating more spaces for tenants to contribute their ideas about organizing social activities.
- Toronto Seniors Housing Corporation held annual building planning meetings, at the beginning of the year, to identify priorities for each building’s Community Activities Fund; tenants requested 351 tenant-led activities, along with 326 new program requests and 300+ equipment requests.

Support of Seniors – Building Activities



- A total of 222 recurring programs led by tenants and service providers are currently being offered in TSHC buildings, reflecting an increase of 14% as compared with those offered in the second quarter 2024, and a significant increase of 24% as compared with those offered in the same quarter (third quarter) of 2023.
- A variety of activities are being organized in TSHC buildings, covering themes such as food security and nutrition, health and wellness, personal development and learning, social recreation, and faith-based activities.

How Well We Are Doing

Service	Measure	2022 Actual	2023 Actual	2024 Target	2024 Projection	Status	2025 Target	2026 Target
Outcome Measures								
Deeply Affordable Housing	TSHC occupied units	96%	98.1%	98%	98%	●	98%	98%
	TSHC rent and fees collected	99%	99.6%	98%	99%	●	98%	98%
Excellent Landlord	Tenant satisfaction with services provided by TSHC	N/A	N/A	N/A	80%		In Development	
	Tenants proud to be residents at TSHC	N/A	N/A	N/A	82%		In Development	
	Tenants feel safe in their home	N/A	N/A	N/A	83%		In Development	
	Tenants feel staff treat them with respect	N/A	N/A	N/A	87%		In Development	
Tenant Engagement	Tenants like the programs in their buildings and find them helpful	N/A	N/A	N/A	57%		In Development	
Access to Supports and Services Outside of TSHC	Tenants feel that TSHC helps them get information to access the service(s) they need	N/A	N/A	N/A	61%		In Development	

2024 Projection to 2024 Target Comparison

- 80-100% (MET TARGET)
- 70 - 79% (LOW RISK)
- 69% and Under (REQUIRES ATTENTION)

EXPERIENCES, CHALLENGES AND PRIORITIES

Our Experience and Success

- Focused on TSHC 2023-2025 Strategic Directions including key strategic objectives and enablers, key performance indicators, and a workplan for the Corporation.
- Implemented Community Connect+ as a new way to work with tenants with goals to increase tenant-led activities, increase volunteerism, and improve tenant health and well-being. Increased agency and tenant-led programming to 222 by the third quarter (up 24% from 2023) and held 68 building meetings receiving requests for 351 tenant-led activities, 326 new agency programs, and 300+ equipment requests.
- Launched the new Community Activities Fund to expand opportunities to fund tenant events and equipment to support activities. Delivered over 150 tenant events (BBQs, holiday celebrations) with 89% of the buildings participating in tenant-led events in collaboration with 172 volunteers.
- Continued operational performance improvements in Housing Occupancy, Rent Collection and Arrears, and Unit-Turn Over, exceeding industry average in all categories. In addition, improved Work-Order backlog being addressed and reduced times with Office of the Commissioner of Housing Equity referrals.
- Completed 13,946 Annual Unit Inspections.
- Complete several deliverables within three quality improvement projects on (1) Safety and Security, (2) Pest Management and (3) Staff and Tenant Relations and a one-year status on all recommendations.
- Placed 317 tenants from the Rapid Rehousing Initiative and 236 tenants through the TSHC Complex Tenancy team to stabilize vulnerable tenancies.
- Developed a new Use of Community Space Policy (to be implemented in 2025) and a new Tenant Human Rights Policy.
- Completed an Employee Engagement survey with a 79% response rate and action plans to address key areas.
- Completed multiple initiatives for staff of training from a senior's lens.
- Developing an Inclusion, Diversity, Equity and Accessibility Strategy.

Key Challenges and Risks

- Financial Stability and Sustainability: TSHC faces long-term financial instability resulting from structural challenges, misaligned funding, inflationary pressure, cost increases and an on-going challenging operating environment. Despite ongoing investment from the City, there is limited ability to increase revenues and this requires ongoing subsidy support and organization-wide cost control measures.
- Community Programming: Lack of capacity to continue to implement TSHC's new tenant engagement model and work to expand partnerships to support community programming for tenants and meet tenant requests for 300+ new programs.
- Lack of corporate capacity: Further delayed hiring of corporate positions may lead to lack of ability to undertake planned projects and initiatives.
- Safety: The risk of increased Community Safety Incidents affecting the security of residents, staff and contractors.

Priority Actions

- Provide safe, clean, and well-maintained buildings and to provide stable tenancies.
- Enhance tenant engagement and inclusion in their communities and provide opportunities for tenants to have a voice.
- Facilitate access to services and programs that tenants need and want.
- Develop and promote innovation and leading practices which contribute to seniors' well-being.
- Strive for organizational excellence to ensure effective and efficient delivery of our mandate.
- Be an employer of choice by fostering a culture of innovation that engages, empowers, and supports staff.
- Toronto Seniors Housing Corporation's service model continues to include the Integrated Service Model (ISM) which is now embedded in our strategy and operations.

CITY STAFF PREPARED BUDGET

City funding for TSHC is reflected in the City's Budget and includes:

- \$47.970 million in City funding for 2025, representing a \$4.061 million increase from 2024. The increase in City funding includes:
 - \$7.740 million towards the base subsidy, calculated as 12.9% of the \$60 million combined TCHC and TSHC subsidy increase in the base budget.
 - \$0.653 million in new and enhanced funding, including \$0.548 million for ongoing initiatives and \$0.105 million for one-time initiatives to support the Integrated Service Model, Vulnerable Tenant Supports, Building Tenant Trust, Chronic Violence Support, and Enhanced Frontline Services.
 - Offset by a reversal of \$4.331 million in one-time subsidy from the City, which was provided as a balancing strategy in 2024.

2025 OPERATING BUDGET

2025 OPERATING BUDGET OVERVIEW

Table 1: 2025 Operating Budget by Service

(In \$000s)	2023 Actual	2024 Budget	2024 Projection*	2025 Base Budget	2025 New / Enhanced	2025 Budget	Change v. 2024 Budget	
By Service	\$	\$	\$	\$	\$	\$	\$	%
Revenues								
Resident Rent - RGI	83,405.9	83,112.2	86,731.8	87,415.8		87,415.8	4,303.6	5.2%
Resident Rent - Market	4,543.5	4,579.1	5,051.9	5,040.0		5,040.0	460.9	10.1%
City Base Subsidy	38,161.0	39,576.6	39,576.6	47,316.5	548.1	47,864.7	8,288.1	20.9%
City One-Time Funding	3,118.8	4,331.8	4,331.8		105.0	105.0	(4,226.9)	(97.6%)
Other Revenue***	3,946.8	5,272.2	1,610.6	1,484.6		1,484.6	(3,787.6)	(71.8%)
2025 One-Time Bridging Strategy****				3,597.3		3,597.3	3,597.3	
Total Revenues	133,175.9	136,871.8	137,302.7	144,854.2	653.1	145,507.3	8,635.4	6.3%
Expenditures								
TCHC Direct Gross Expenditures	88,819.0	93,391.9	88,741.6	97,419.8	294.4	97,714.2	4,322.3	4.6%
TSHC Direct Gross Expenditures	44,356.9	43,479.9	44,553.3	47,434.4	358.7	47,793.1	4,313.2	9.9%
Total Gross Expenditures	133,175.9	136,871.8	133,294.8	144,854.2	653.1	145,507.3	8,635.5	6.3%
Net Expenditures			(4,007.9)					
Approved Positions**	306.0	325.5	N/A	327.5	3.0	330.5	5.0	1.5%

* 2024 Projection based on 9 Month Variance

** YoY comparison based on approved positions

*** 2024 Budget includes \$4.3M TCHC surplus to balance TSHC deficit position. Similarly, TCHC's gross expenditures increased by the same amount

**** 2025 One-Time Bridging Strategy represents 2024's TSHC Surplus Reserve

KEY DRIVERS

Total 2025 Budget expenditures of \$145.507 million gross reflects an increase of \$8.635 million in spending above 2024 budget, predominantly arising from:

- Base expenditure increase of \$4.322 million for shared overhead costs such as property management, security, facility management, and other administrative support with Toronto Community Housing Corporation (TCHC).
- Base expenditure increase of \$3.903 million for salary and benefits adjustments, including two additional positions for maintaining existing services and service levels to tenants.
- \$0.653 million for new/enhanced investments including three full-time tenant-facing positions to support tenant engagement initiatives as part of the Integrated Service Model (ISM). This model focuses on providing coordinated and comprehensive services to seniors living in TSHC housing, enhancing their overall well-being and engagement with the community.

EQUITY IMPACTS OF BUDGET CHANGES

Toronto Seniors Housing Corporation's \$0.653 million investment in the 2025 Operating Budget for the Integrated Service Model, Vulnerable Tenant Supports, Building Tenant Trust, Chronic Violence Support, and Enhanced Frontline Services is expected to have a **significant positive equity impact** on racialized, low-income, women, socially isolated, and seniors living with disabilities.

2025 OPERATING BUDGET KEY COST DRIVERS

The 2025 Net Operating Budget for TSHC of \$47.970 million, prior to City funding, is \$4.061 million or 9.2% greater than the 2024 Net Budget. Table 2 below summarizes the key cost drivers for the 2025 Budget.

Table 2: 2025 Key Cost Drivers

(In \$000s)	2025 Request				2026 Annualized impact (Net)
	Revenues	Gross	Net	Positions**	
2024 Operating Budget	92,963.5	136,871.8	43,908.4	325.5	
Key Cost Drivers:					
<i>Prior Year Impacts</i>					
Reversal of 2024 transfer from TCHC	(4,341.1)		4,341.1		
<i>Salary and Benefits</i>					
Salary and benefits adjustments		3,646.4	3,646.4		2,047.4
Hiring plan (deferral from 2024)		256.6	256.6	2.0	
<i>Other Base Expenditure Changes</i>					
TCHC's allocation gross expenditure to TSHC		4,027.9	4,027.9		3,636.7
Other costs		303.5	303.5		462.4
<i>Other Base Revenue Changes</i>					
RGI and market rent increases	4,764.5		(4,764.5)		(1,386.8)
Other revenue changes	553.5		(553.5)		(32.9)
One-time balancing strategy	3,597.3		(3,597.3)		3,597.3
Sub-Total - Key Cost Drivers	4,574.2	8,234.4	3,660.2	2.0	8,324.0
Affordability Measures		(252.0)	(252.0)		
New/Enhanced		653.1	653.1	3.0	49.0
Total 2025 Request w/o City Funding	97,537.7	145,507.3	47,969.6	330.5	8,373.0
Change from 2024 Budget (\$)	4,574.2	8,635.5	4,061.3	5.0	
Change from 2024 Budget (%)	4.9%	6.3%	9.2%	1.5%	
City Funding:					
2024 City funding	43,908.4		(43,908.4)		
Reversal of one-time 2024 funding	(4,331.8)		4,331.8		
Base subsidy increase	7,740.0		(7,740.0)		
Base funding for New/Enhanced	548.1		(548.1)		
One-time funding for New/Enhanced	105.0		(105.0)		105.0
Total City Funding	47,969.6		(47,969.6)		105.0
Total 2025 Budget	145,507.3	145,507.3	0.0	330.5	8,478.0
Change from 2024 Budget (\$)	8,635.5	8,635.5	0.0	5.0	
Change from 2024 Budget (%)	6.3%	6.3%	0.0%	1.5%	

*Based on 9 Month Variance

**YoY comparison based on approved positions

Key Base Drivers:**Prior Year Impacts:**

- Reversal of \$4.341 million in funding transferred from TCHC to balance the 2024 Budget between TSHC and TCHC.

Salary and Benefits:

- \$3.646 million in salary and benefits adjustments to support current operations and tenants.
- \$0.257 million for two full time staff which are required to carry out existing functions.

Other Base Expenditure Changes:

- \$4.028 million increase in expenses allocated from TCHC relating to shared overhead costs, shared costs related to security, facilities, and other operating expenses.

Revenue Changes:

- \$4.765 million incremental RGI and Market Rent revenues, reflecting an increase of 5.4% in 2025.
- \$3.597 million from a one-time balancing strategy utilizing the 2024 surplus to alleviate budget pressures.

City Funding:

- In the 2024 Budget, one-time funding was provided to TSHC as a bridging strategy. Starting in the 2025 Budget, this has been transitioned to ongoing base funding as part of a multi-year approach to support TSHC's progress toward financial sustainability.
- \$8.288 million increase to the ongoing base subsidy, which includes:
 - \$7.740 million towards the base budget, calculated as 12.9% of the \$60 million combined TCHC and TSHC subsidy included in the base budget.
 - \$0.548 million towards ongoing new/enhance initiatives.
- \$0.105 million in one-time funding from the City towards one-time new/enhanced initiatives.
- Reversal of \$4.331 million in one-time subsidy from the City, which was provided as a balancing strategy in 2024. This was calculated as 12.9% of the \$33.580 million reversal of combined TCHC and TSHC one-time funding.

Affordability Measures:**Table 3: Offsets and Efficiencies**

(In \$000s)									
Recommendation	Savings Type	Equity Impact	2025				2026 (Incremental)		
			Revenue	Gross	Net	Positions	Gross	Net	Positions
Line By Line Review	Line By Line	None	(252.0)	(252.0)					
Total Affordability Measures			(252.0)	(252.0)					

Line by Line Review – A review of base expenditures resulted in overall savings of \$0.252 million, primarily driven by maintenance adjustments based on actual needs.

New and Enhanced Service Priorities:

Table 4: New / Enhanced Requests

New / Enhanced Request	2025				2026 Annualized Gross	Equity Impact	Supports Key Outcome / Priority Actions
	Revenue	Gross	Net	Positions			
In \$ Thousands							
1 Tenant Support - Integrated Service Model	358.7	358.7		3.0	375.7	High - Positive	Funding for three full-time positions to support key outcomes and priority actions for the initiatives under the Integrated Service Model (ISM). These roles will enhance tenant engagement by expanding programs, volunteer opportunities, and partnerships that foster inclusion and improve seniors well-being. Additionally, the program will renew 55 partnership agreements and establish new collaborations to enhance services, while reducing the service ratio from 1:3750 to 1:2344, improving capacity to address tenant needs effectively.
2 Vulnerable Tenant Supports	108.3	108.3			230.5	High - Positive	The funding represents 12.9% of the overall program cost, reflecting the cost-sharing ratio with TCHC. This funding will strengthen the delivery of localized and responsive services for high-needs areas, focusing on safety, staffing, and program resources. It supports key priority actions, including the High-Need Community Strategy, Rapid Rehousing Initiative, and the Anchor Agency Services and Support pilot. Expected outcomes include improved interventions to ensure successful tenancies, addressing growing accessibility demands due to demographic changes, and reducing the workload burden on staff.
3 Building Tenant Trust	109.0	109.0			29.7	High - Positive	The funding represents 12.9% of the overall program cost, reflecting the cost-sharing ratio with TCHC. The program aims to improve tenant engagement and foster vibrant, empowered communities by enhancing tenant capacity to participate in decision-making and lead local initiatives. Key outcomes include implementing recommendations from the Tenant Engagement System Review, increasing the Tenant Action Funds for tenant-led projects, and supporting community economic development programs like Toronto Fire Services Pathways, which helps tenants explore fire services careers, and Rookie League, offering summer camp experiences for 400+ children and youth employment opportunities.
4 Chronic Violence Support	51.4	51.4			66.2	High - Positive	The funding represents 12.9% of the overall program cost, reflecting the cost-sharing ratio with TCHC. The program seeks to transition from a temporary initiative to an ongoing strategy aimed at improving safety in TCHC communities affected by chronic gun violence. This program invests in person- and place-based violence reduction and prevention efforts, focusing on analysis, infrastructure alignment, targeted response, and community development. Expected outcomes include implementing best practices in violence prevention and enhancing data collection and reporting through collaboration with the City of Toronto, Toronto Police Service, Toronto District School Board, and other partners.
5 Enhancing Frontline Services	25.7	25.7				High - Positive	The funding represents 12.9% of the overall program cost, reflecting the cost-sharing ratio with TCHC. The program introduces an in-house maintenance pilot and semi-skilled training initiative to improve service delivery and reduce reliance on costly external vendors for repairs. The pilot will train frontline staff to handle licensed work in-house, addressing challenges such as delayed services, budget overruns, and poor workmanship associated with outsourcing. Additionally, a semi-skilled training program will equip staff to perform repairs in areas like plumbing, electrical, and door and lock maintenance. Expected outcomes include improved service delivery, enhanced tenant satisfaction, and optimized maintenance budgets.
Total New / Enhanced	653.1	653.1		3.0	702.1		

Note:

- For additional information, please refer to [Appendix 2](#) for details on 2025 Service Changes; [Appendix 3](#) for the 2025 New and Enhanced Service Priorities and [Appendix 4](#) for Operating Program Provincial/Federal Funding Streams by Funding Source, respectively.

2026 AND 2027 OUTLOOKS

Table 5: 2026 and 2027 Outlooks

(In \$000s)	2025 Budget	2026 Incremental Outlook	2027 Incremental Outlook
Revenues			
Revenue changes - RGI and Market rent		1,386.8	1,407.6
One-time balancing strategy		(3,597.3)	
Reversal of one-time new and enhanced		(105.0)	
Others		32.9	33.6
Total Revenues	145,507.3	(2,282.5)	1,441.3
Gross Expenditures			
Inflationary impacts - salary and benefits		1,362.6	1,557.5
Inflationary impacts - non-salary and benefits		462.4	102.7
Inflationary impacts - TCHC direct gross expenditures		3,636.7	3,683.9
Reinstate deferred positions (4 in 2026, 4 in 2027)		684.8	728.8
New and enhanced		49.0	189.2
Total Gross Expenditures	145,507.3	6,195.5	6,262.1
Net Expenditures		8,478.0	4,820.8
Approved Positions	330.5	4.0	4.0

Key Outlook Drivers

The 2026 Outlook reflects an anticipated net increase of \$8.478 million above the 2025 Operating Budget. The 2027 Outlook includes a further net increase of \$4.821 million above the 2026 Outlook.

These changes arise mainly from the following:

- Reversal of the one-time balancing strategy from prior year decisions where the 2024 TSHC operating surplus was used to balance the 2025 Budget, resulting in a net pressure in 2026.
- Inflationary increases to the allocation of shared expenditures from TCHC, salary and benefits adjustments, and other non-labour costs will add to the net pressure in 2026 and 2027.
- Positions deferred through prior budget processes are included in the 2026 and 2027 Outlooks, with four positions added in 2026 and an additional four added in 2027.
- Rent Geared to Income and Market Rent is forecasted to increase by an assumed 1.5% from 2025.

APPENDICES

Appendix 1

2025 Operating Budget by Category

Category (In \$000s)	2023	2024	2024	2025	2025 Change from 2024		2025 Change from 2024	
	Actual	Budget	Projection*	Budget	Budget		Projection	
	\$	\$	\$	\$	\$	%	\$	%
Residential rent - RGI	83,405.9	83,112.2	86,731.8	87,415.8	4,303.6	5.2%	683.9	0.8%
Residential rent - Market	4,543.5	4,579.1	5,051.9	5,040.0	460.9	10.1%	(11.9)	(0.2%)
Subsidies - City	41,279.8	44,682.4	43,908.4	47,969.6	3,287.2	7.4%	4,061.2	9.2%
Other revenue	3,946.7	4,498.1	1,610.6	1,484.6	(3,013.5)	(67.0%)	(126.0)	(7.8%)
2025 One-Time Bridging Strategy				3,597.3				
Total Revenues	133,175.9	136,871.8	137,302.7	145,507.3	8,635.5	6.3%	8,204.6	6.0%
OPERATING COSTS								
Utilities	23,293.6	23,040.5	22,502.5	24,173.3	1,132.8	4.9%	1,670.8	7.4%
Mortgage Interest & Principal	27,991.6	29,413.5	28,888.5	30,361.9	948.4	3.2%	1,473.5	5.1%
TCHC - Other Allocated Operating costs	26,728.0	29,548.0	27,679.5	31,438.3	1,890.4	6.4%	3,758.8	13.6%
TCHC - Corporate Allocated costs	10,805.9	11,390.0	9,671.1	11,740.7	350.7	3.1%	2,069.6	21.4%
TSHC - Direct Operating Costs	44,356.8	43,479.9	44,553.4	47,793.1	4,313.2	9.9%	3,239.7	7.3%
Total Gross Expenditures	133,175.9	136,871.8	133,294.9	145,507.3	8,635.5	6.3%	12,212.4	9.2%
Net Expenditures			(4,007.8)				4,007.8	

*Projection based on 9 Months Variance

Appendix 2

Summary of 2025 Service Changes

N/A

Appendix 3

Summary of 2025 New / Enhanced Service Priorities Included in Budget



2025 Operating Budget - New and Enhanced Service Priorities Summary by Service (\$000's)

Form ID		Development & Growth Services Agency - Toronto Seniors Housing Corporation	Adjustments			Approved Positions	2026 Plan Net Change	2027 Plan Net Change
Category	Equity Impact		Gross Expenditure	Revenue	Net			
N/A		Integrated Service Model						
74	Positive	<p>Description:</p> <p>To fund three full-time tenant-facing positions aimed at supporting tenant engagement initiatives, which are part of the Integrated Service Model (ISM), mandated by the City through the TSHC Shareholder direction. This model focuses on providing coordinated and comprehensive services to seniors living in TSHC, enhancing their overall well-being and engagement with the community and their ability to age at home in dignity and stability.</p> <p>Service Level Impact:</p> <p>TSHC is addressing a critical need for enhanced tenant engagement by implementing three new positions to support the ISM. The initiative responds to a dramatic surge in tenant program participation and community involvement. In 2024, tenants have identified over 300 new programs, representing a 135% increase from the previous year's 222 programs. These programs span diverse areas including health and wellness, social recreation, personal growth, food security, and faith-based activities.</p> <p>The volunteer landscape has similarly transformed, with the volunteer base expanding from 73 to over 150 active volunteers, and an additional 300 tenants expressing interest in volunteering. This growth necessitates a comprehensive volunteer development and management program. The organization has also seen a significant increase in community events, projecting 273 events in 2024 compared to just 99 events in 2023, along with over 300 new equipment requests for activities and community spaces.</p> <p>To support this exponential growth, two new Community Services Coordinators and a Supervisor will be added to the existing team of four. This will shift the current resource ratio from 1 staff member per 3,750 tenants to 1 staff member per 2,344 tenants. The strategic objectives remain focused on addressing social isolation, fostering community inclusion, and enabling seniors to age at home with dignity and stability. Additionally, the plan includes renewing 55 existing partnership agreements and exploring new partnerships to improve overall service performance.</p> <p>This targeted investment directly supports TSHC's commitment to the Integrated Service Model, ensuring that seniors have access to coordinated, comprehensive services that enhance their quality of life and community engagement. By recognizing and responding to the growing needs and interests of their tenants, TSHC is creating a more dynamic, supportive, and inclusive living environment for seniors.</p> <p>Equity Statement:</p> <p>The proposed investment in three full-time positions demonstrates TSHC's commitment to addressing systemic barriers for seniors by providing tailored, culturally responsive programming that empowers diverse residents and reduces social isolation through expanded, inclusive community engagement opportunities. By prioritizing tenant-led initiatives and increasing support resources, the initiative seeks to create equitable access to programs that recognize and respond to the unique needs of seniors from varied backgrounds, abilities, and socioeconomic circumstances.</p> <p>Service: Tenancy Support</p>						
Total Staff Prepared Budget Changes:			358.7	358.7		3.00	16.9	19.3
Staff Prepared New/Enhanced Service Priorities:			358.7	358.7		3.00	16.9	19.3



**2025 Operating Budget - New and Enhanced Service Priorities
Summary by Service (\$000's)**

Form ID		Development & Growth Services Agency - Toronto Seniors Housing Corporation	Adjustments			2026 Plan Net Change	2027 Plan Net Change
Category	Equity Impact		Gross Expenditure	Revenue	Net		
N/A		Vulnerable Tenant Supports					
74	Positive	Description: Enhance support for high-needs communities and areas where there are higher levels of vulnerabilities and complex tenancies. This includes delivering responsive and localized services with intensified staff, safety, and program resources at the community and building level. This funding will support our high-need community strategy, Rapid Rehousing Initiative supports program, the Anchor Agency Services and Support pilot. The funding represents 12.9% of the overall program cost, reflecting the cost-sharing ratio with Toronto Community Housing Corporation (TCHC). Service Level Impact: This funding will strengthen the delivery of localized and responsive services for high-needs areas, focusing on safety, staffing, and program resources. It supports key priority actions, including the High-Need Community Strategy, Rapid Rehousing Initiative, and the Anchor Agency Services and Support pilot. Expected outcomes include improved interventions to ensure successful tenancies, addressing growing accessibility demands due to demographic changes, and reducing the workload burden on staff. Without this funding, communities will face extended wait times for accessibility repairs, limited support for vulnerable buildings, and increased instability. Additionally, TCHC's ability to expand the Anchor Agency pilot and strengthen partnerships with Housing Stability Services and Coordinated Access will be significantly hindered. Equity Statement: This initiative promotes inclusion and fairness by improving accessibility infrastructure, addressing demographic shifts, and reducing service gaps that disproportionately impact marginalized populations. Additionally, it fosters economic and social equity through the Anchor Agency Services and Support pilot, which collaborates with community partners to deliver targeted resources and build tenant capacity. Service: Tenancy Support					
Total Staff Prepared Budget Changes:			108.3	108.3		122.2	170.1
Staff Prepared New/Enhanced Service Priorities:			108.3	108.3		122.2	170.1



**2025 Operating Budget - New and Enhanced Service Priorities
Summary by Service (\$000's)**

Form ID		Development & Growth Services Agency - Toronto Seniors Housing Corporation	Adjustments			2026 Plan Net Change	2027 Plan Net Change
Category	Equity Impact		Gross Expenditure	Revenue	Net		
N/A		Building Tenant Trust					
74	Positive	Description: Execute on opportunities to improve tenant engagement and build more enjoyable communities by investing in programs that enhance tenant capacity to engage with the organization, make decisions about the communities in which they live, and to deliver locally developed and tenant-led initiatives that directly impact their own communities. The funding represents 12.9% of the overall program cost, reflecting the cost-sharing ratio with Toronto Community Housing Corporation (TCHC). Service Level Impact: Program aims to improve tenant engagement and foster vibrant, empowered communities by enhancing tenant capacity to participate in decision-making and lead local initiatives. Key outcomes include implementing recommendations from the Tenant Engagement System Review, increasing the Tenant Action Funds for tenant-led projects, and supporting community economic development programs like Toronto Fire Services Pathways, which helps tenants explore fire services careers, and Rookie League, offering summer camp experiences for 400+ children and youth employment opportunities. Without this funding, TCHC risks reduced service levels, limited community and economic development opportunities, and ongoing tenant dissatisfaction and disengagement. Equity Statement: The initiative advances equity by empowering tenants, particularly those from underserved and vulnerable communities, to actively participate in decision-making and lead initiatives that impact their lives. By implementing the Tenant Engagement System Review recommendations and increasing Tenant Action Funds, the program addresses systemic barriers, fostering inclusion and tenant leadership. It also promotes workforce equity through initiatives like the Toronto Fire Services Pathways, which supports career development for equity-seeking groups, and the Rookie League, providing over 400 children with summer camp experiences and creating employment opportunities for TCHC youth. Service: Tenancy Support					
Total Staff Prepared Budget Changes:			109.0	109.0		(79.3)	0.0
Staff Prepared New/Enhanced Service Priorities:			109.0	109.0		(79.3)	0.0



**2025 Operating Budget - New and Enhanced Service Priorities
Summary by Service (\$000's)**

Form ID		Development & Growth Services Agency - Toronto Seniors Housing Corporation	Adjustments			Approved Positions	2026 Plan Net Change	2027 Plan Net Change
Category	Equity Impact		Gross Expenditure	Revenue	Net			
N/A		Chronic Violence Support						
74	Positive	Description: Transform the violence reduction program from temporary support to on-going program as a long-term strategy to improve community safety. This includes investments in person-and-place based violence reduction and prevention programming in specific Toronto Community Housing Corporation (TCHC) properties/communities that are experiencing chronic gun violence. The strategy identifies four key work streams: analysis & monitoring, infrastructure alignment, focused response and community development. Despite having a comprehensive plan in place, crucial components remain unfunded, including essential partnership and program funding. The funding represents 12.9% of the overall program cost, reflecting the cost-sharing ratio with Toronto Community Housing Corporation (TCHC). Service Level Impact: The program seeks to transition from a temporary initiative to an ongoing strategy aimed at improving safety in TCHC communities affected by chronic gun violence. This program invests in person- and place-based violence reduction and prevention efforts, focusing on analysis, infrastructure alignment, targeted response, and community development. Expected outcomes include implementing best practices in violence prevention and enhancing data collection and reporting through collaboration with the City of Toronto, Toronto Police Service, Toronto District School Board, and other partners. Without this funding, critical components such as partnerships, programming, and staffing will remain unfunded, limiting the program's ability to support tenants impacted by or at the center of violence. Equity Statement: Supports equity by addressing systemic inequities faced by residents in TCHC communities disproportionately affected by chronic gun violence. This program transitions violence reduction efforts from temporary to ongoing, ensuring sustainable and targeted interventions that prioritize the safety and well-being of vulnerable tenants. Service: Tenancy Support						
Total Staff Prepared Budget Changes:			51.4	51.4			14.8	1.7
Staff Prepared New/Enhanced Service Priorities:			51.4	51.4			14.8	1.7



**2025 Operating Budget - New and Enhanced Service Priorities
Summary by Service (\$000's)**

Form ID		Development & Growth Services Agency - Toronto Seniors Housing Corporation	Adjustments			Approved Positions	2026 Plan Net Change	2027 Plan Net Change
Category	Equity Impact		Gross Expenditure	Revenue	Net			
N/A		Enhancing Frontline Services						
74	Positive	Description: Funding for an in-house maintenance pilot and semi-skilled training initiative to improve service delivery and reduce reliance on costly external vendors for repairs. The pilot will train frontline staff to handle licensed work in-house, addressing challenges such as delayed services, budget overruns, and poor workmanship associated with outsourcing. Additionally, a semi-skilled training program will equip staff to perform repairs in areas like plumbing, electrical, and door and lock maintenance. The funding represents 12.9% of the overall program cost, reflecting the cost-sharing ratio with Toronto Community Housing Corporation (TCHC). Service Level Impact: Expected outcomes include improved service delivery, enhanced tenant satisfaction, and optimized maintenance budgets for maintenance repairs. Equity Statement: The proposed in-house maintenance pilot and semi-skilled training initiative support equity by enhancing service delivery for tenants in TCHC properties, many of whom are from equity-deserving communities. The semi-skilled training program creates workforce development opportunities, equipping frontline staff with skills in trades like plumbing, electrical work, and maintenance. These efforts not only enhance service capacity but also support inclusive employment practices by providing training and career growth for staff, many of whom may represent equity-deserving groups. Service: Tenancy Support						
Total Staff Prepared Budget Changes:			25.7	25.7			(25.7)	0.0
Staff Prepared New/Enhanced Service Priorities:			25.7	25.7			(25.7)	0.0

Appendix 4

Operating Program Provincial/Federal Funding Streams by Program

N/A

Appendix 5

2025 Capital Budget; 2026 - 2034 Capital Plan Including Carry Forward Funding

N/A

Appendix 5a

2025 Cash Flow and Future Year Commitments Including Carry Forward Funding

N/A

Appendix 5b

2026 - 2034 Capital Plan

N/A

Appendix 6

Reporting on Major Capital Projects: Status Update

N/A

Appendix 7

Capacity to Deliver Review

N/A

Appendix 8

Summary of Capital Delivery Constraints

N/A

Appendix 9

Capital Program Provincial/Federal Funding Streams by Project

N/A

Appendix 10

Inflows and Outflows to/from Reserves and Reserve Funds

N/A

Appendix 11

Glossary

Approved Position: Permanent or temporary positions that support the delivery of City services and service levels in annual budget.

Actuals: An actual financial amount paid (or received) for the delivery of City services (these exclude any commitments to be paid in the future).

Capacity to Delivery: Ability to spend money along with the capacity to deliver projects as demonstrated by historic spending patterns and approved contractual obligations.

Capital Budget and Plan: A Capital Budget and Plan is the City's 10-year strategy to acquire/build assets or extend the useful lives of existing assets. The Capital Budget is the first year of approved cash flows and future year's commitments and the remaining nine years include project estimates.

Capital Delivery Constraints: The capital needs that cannot be accommodated within the capital plan that the Division or Agency have the capacity to deliver.

Complement: Positions that support the delivery of City services and service levels as approved by Council.

Efficiencies: Reductions in the cost of delivering a service without a reduction in service level.

New / Enhanced Service Priorities: New and enhanced service changes resulting in an increase in service levels from what was previously approved by Council.

Operating Budget: An Operating Budget is the City's annual plan to provide services to the residents of Toronto; the budget includes all revenues and expenses needed to provide services.

Operating Impact of Completed Capital Projects: The Operating Budget Impact of Capital is the change in operating expenditure and / or revenue, which is projected to occur during the implementation of a capital project and / or when a capital project is completed. These changes should be documented on a Business Case Form in the appropriate category.

Rate Supported Budget: Budget fully funded by user fees such as Solid Waste, Toronto Water and Toronto Parking Authority.

Salary and Benefits Adjustment: General increases related to contractual obligations, such as cost of living, step increases, pay for performance and progression pay.

State of Good Repair (SOGR): The cost of maintaining assets to ensure that they can support the delivery of City services and meet service outcomes.

Tax Supported Budget: Budget funded by property taxes.

User Fees: Includes all program-generated fees and rental revenue for the use of its services (such as the TTC fare, ice rental fees and various City permits).