

## **Toronto Seniors Housing Corporation (TSHC) Accessibility Policy**

**Policy Sponsor:** Director, Strategy and Business Management

**Approver:** Board of Directors

**Initial Approval Date:** May 17, 2022

**Effective Date:** June 1, 2022

### **Organizational Statement of Commitment**

Toronto Seniors Housing Corporation (TSHC) is committed to providing an inclusive environment to tenants and employees with disabilities in accordance with the core principles of accommodation, dignity, independence, integration and equal opportunity outlined in the Human Rights Code, R.S.O. 1990, c.H.19 and the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c.11, and the complimentary legislation of the Employment Standards Act, 2000, S.O. 2000, c.41, the Ontario Building Code, O. Reg. 332/12, and the Integrated Accessibility Standards, O. Reg.191/11.

### **Policy Statement**

Toronto Seniors Housing Corporation recognizes the need to identify and remove barriers faced by people with disabilities and will achieve greater accessibility by aligning with a culture that recognizes the dignity and worth of every individual.

This policy provides an overview of all of Toronto Seniors Housing Corporation's policies, plans and programs as they relate to accessibility. While components of this policy are intended to address the corporation's compliance with legislation, Toronto Seniors Housing Corporation's commitment to accessibility extends beyond legislative compliance. As Toronto Seniors Housing Corporation continues to achieve accessible social housing and employment, this policy requires Toronto Seniors Housing Corporation staff to incorporate best practices in accessibility through all aspects of its business. Toronto Seniors Housing Corporation will engage and consult with stakeholders, tenants, and employees with disabilities in the development of its accessibility policies, plans, and programs.

### **Definitions**

**Accessible formats:** Formats that are an alternative to standard formats and are accessible to people with disabilities. Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

**Communication supports:** Supports that individuals with disabilities may need to access information. These include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and

other supports that facilitate effective communications.

**Disability:** From the Ontario Human Rights Code, R.S.O. 1990, c. H. 19:

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness;
- a condition of mental impairment or developmental disability;
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoke language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the Workplace Safety and Insurance Act, 1997, S.O. 1997, c. 16 sche. A, or Ontario Disability Support Program.

In addition, the definition of disability under the Ontario Human Rights Code, R.S.O. 1990, c. H. 19, may include but is not limited to:

- Acquired Brain Injury
- Deaf, deafened, hard-of-hearing
- Low vision or blind
- Chronic health conditions (cancer, epilepsy, heart disease, etc.)

**Accessibility Lead:** The member of the leadership team who has been designated as the lead for this policy and all related accessibility initiatives.

**Toronto Seniors Housing Corporation staff:** All Toronto Seniors Housing Corporation employees, whether full or part-time, temporary or permanent, including secondees.

**Volunteers:** Any individual who works for or on behalf of Toronto Seniors Housing Corporation on an unpaid basis, or for nominal consideration, including, but not limited to, volunteers, tenant volunteers, interns, and students.

## Scope

This policy applies to all Toronto Seniors Housing Corporation staff, volunteers, and third party contractors who interact with tenants or staff on behalf of Toronto Seniors Housing Corporation.

## Core Principles

In keeping with our values of respect, inclusion, accountability and innovation, Toronto Seniors Housing Corporation will implement this policy in accordance with the following principles:

### Dignity

Tenants and staff are treated in a respectful manner.

## **Independence**

Services, opportunities, programs, and facilities for persons with disabilities will support their independence while respecting their right to safety and personal privacy. Service delivery will consider the nature of the service and alternative accommodation that may be required.

## **Equity/Equality of Outcome**

Tenants and staff with disabilities will be provided the same access to our programs, services, opportunities, and facilities as all other tenants and staff.

## **Integration**

Tenants and staff with disabilities will fully benefit from the same programs, services, opportunities, and facilities, in the same places and in the same or similar way as all other tenants and staff. An emphasis on inclusion will focus on eliminating barriers for people with disabilities.

## **Governance and Legislation**

Toronto Seniors Housing Corporation will meet or exceed the following legislative requirements:

### **Accessibility for Ontarians with Disabilities Act, 2005 (AODA)**

The AODA came into effect in 2005. It permits the Ontario government to establish Accessibility Standards to remove or prevent barriers for Ontarians with disabilities by 2025. For details on Toronto Seniors Housing Corporation's compliance with the AODA and associated legislation refer to the relevant policies as listed in the Policy Details.

### **Employment Standards Act, 2000 (ESA)**

The ESA sets out the minimum standards for working in Ontario and defines the rights and responsibilities of employees and employers. Toronto Seniors Housing Corporation is committed to complying with the standards outlined in the ESA as they relate to accessibility and accommodation on the basis of disability.

### **Ontario Human Rights Code (OHRC)**

The OHRC was enacted in 1990 and ensures the rights of all people to be treated equally and without discrimination based on race, colour, gender identity, sex, sexual orientation, disability, creed and age. Toronto Seniors Housing Corporation is committed to upholding the OHRC in its entirety.

### **Integrated Accessibility Standards (IASR)**

The IASR was enacted under the AODA in 2011, with phased implementation requirements commencing January 1, 2012 through to January 1, 2021.

The IASR addresses three specific areas of relevance to Toronto Seniors Housing Corporation: accessible employment practices; accessible information and communication supports; and design of the built environment. Provisions that guide staff in complying with the IASR can be found in a number of policies, programs and standards and are noted in the Policy Details below.

Toronto Seniors Housing Corporation tracks the implementation of the IASR in its multi-year Accessibility Plan. The plan is posted on Toronto Seniors Housing Corporation's website and is made available in accessible formats upon request. The plan is updated on an ongoing basis and is fully reviewed every five years.

## **Ontario Building Code (OBC)**

The OBC is a set of mandated building design and construction standards aimed at minimizing the risk to the health and safety of the occupants of a building and to provide for the barrier-free access to buildings. Toronto Seniors Housing Corporation follows the standards set out in the OBC in order to make sure that the design and construction of all new buildings, and changes and additions to existing buildings serve to increase accessibility for tenants and meet legislative requirements by 2025.

## **Accessibility Focus Areas**

### **Accessible Customer Service**

Toronto Seniors Housing Corporation will develop best practices to provide accessible customer service in a respectful and transparent manner. The relevant policies and programs are summarized below and the details can be found in the documents themselves.

- **Accessible Customer Service Policy:** outlines our commitment to provide customer service that is inclusive, barrier free and meets the unique needs of persons with disabilities.
- **Communication Standards/Accessible Formats and Communications Supports:** outlines the standards that Toronto Seniors Housing Corporation follows in all communications to tenants. These standards include the Information and Communications Standards as outlined in the IASR.
- **Human Rights, Harassment & Fair Access Policy:** Includes proactive measures to eliminate harassment and discrimination in accommodation, employment, delivery of services, and in all other contract arrangements. It reflects the requirements of the OHRC and policies established by the City of Toronto.
- **Self-Service Kiosk Standards:** Toronto Seniors Housing Corporation will ensure accessibility for persons with disabilities when designing, procuring and

acquiring self-service kiosks, as indicated in the IASR.

- **Tenant Transfer Policy:** formalizes Toronto Seniors Housing Corporation's commitment to priority transfers of persons who have a medically documented need for accessible accommodation.
- **Tenant Complaints Process:** ensures that complaints are heard, the facts of the complaints are established, and where required, remedial actions are taken. The primary objective of this process is to outline a simple process which is accessible to all.

## Accessible Homes

Toronto Seniors Housing Corporation will ensure that tenants with disabilities can live in units, buildings and communities that accommodate their needs. The relevant policies and programs are summarized here and the details can be found in the documents themselves.

- **Accessibility in the Built Environment Policy:** TSHC strives to treat all individuals in a manner that allows them to maintain their dignity and independence and is committed to providing an inclusive environment to tenants with disabilities as outlined in the Human Rights Code, the Accessibility for Ontarians with Disabilities Act, and the complimentary legislation of the Ontario Building Code, and the Integrated Accessibility Standards. As the buildings TSHC manages are owned by Toronto Community Housing Corporation (TCHC), TSHC uses the TCHC's Build Standards to provide guidance as they apply to minor accessibility modifications that TSHC may make to tenants' units. TSHC's Accessibility Plan sets out TSHC's policy on how we will achieve accessibility generally, as well as in the built environment.
- **Accessibility Program: Capital Planning:** TSHC participates in TCHC's capital planning and implementation process for planned capital improvements.
- **Accessibility Program: Tenant Request Unit Modifications:** includes standards and a process for accessibility-related unit modifications based on tenant request and documented medical need.

## Accessible Workplaces

Toronto Seniors Housing Corporation will ensure that employees with disabilities are accommodated in a respectful and transparent manner. The relevant policies and programs are summarized here and the details can be found in the documents themselves.

- **Hiring Policy:** Outlines Toronto Seniors Housing Corporation's commitment to meeting its statutory obligations in the hiring process, and ensures that employment accommodation is provided to all candidates in accordance with the OHRC and the ESA.

- **Human Rights, Harassment & Fair Access Policy:** Includes proactive measures to eliminate harassment and discrimination in accommodation, employment, delivery of services, and in all other contract arrangements. It reflects the requirements of the OHRC and policies established by the City of Toronto.
- **Individualized Workplace Emergency Response Information:** Individualized workplace emergency response information will be prepared for employees with disabilities where the disability is such that the individualized information is necessary and Toronto Seniors Housing Corporation is aware of the need for accommodation due to the employee's disability. This will be prepared as soon as practicable after Toronto Seniors Housing Corporation becomes aware of the need for accommodation due to the employee's disability. A detailed process can be found as part of Toronto Seniors Housing Corporation's Workplace Accommodation Policy.
- **Workplace Accommodation Policy:** Facilitates effective responses to accommodation issues that arise in the workplace and ensures Toronto Seniors Housing Corporation meets its duty to accommodate under the OHRC.

## Supports for Policy Implementation

- **Staff Training:** Toronto Seniors Housing Corporation will ensure that accessibility training is provided to all employees and persons who participate in developing our policies.

The training will consist of requirements under the IASR; the parts of the OHRC that pertain to people with disabilities.

The training will be appropriate to the duties of the person being trained and will be provided as soon as practicable. A record will be kept of the dates of the training and the number of individuals trained.

Toronto Seniors Housing Corporation will also provide training on an ongoing basis when changes are made to the policies and programs listed above, and to new employees as part of the on-boarding process.

- **Tenant & Staff Engagement:** Toronto Seniors Housing Corporation will consult and work with tenants with disabilities and stakeholders in the development of the above accessibility policies, plans, and programs. Toronto Seniors Housing Corporation will consult with appropriate stakeholders, which may include tenants with disabilities, tenant accessibility advocacy groups, experts in the field of accessibility, and Toronto Seniors Housing Corporation staff when undertaking formal reviews of this policy and any other Toronto Seniors Housing Corporation policies related to accessibility.
- **Procuring Goods and Services:** Toronto Seniors Housing Corporation's Procurement Department shall incorporate accessibility criteria and features into its procurement process, procurement documents shall specify the



desired accessibility standards to be met and the related submission requirements, except where it is not practical to do so. Where it is impractical to incorporate accessibility criteria and features into the procurement process, the Procurement Department will provide an explanation upon request. The Procurement Department will also ensure that all selected vendors, where applicable, comply with the AODA and its regulations when providing accessible goods and services to Toronto Seniors Housing Corporation.

## Compliance and Monitoring

### Accessibility Reviews

All new or revised policies and procedures will be reviewed to ensure legislative compliance. When developing, revising and implementing Toronto Seniors Housing Corporation's policies and strategies, authorized Toronto Seniors Housing Corporation staff will conduct an accessibility review. This review will consider and address accessibility, with a particular focus on reducing barriers faced by people with disabilities and ensuring the principles guiding this policy are upheld.

### Reporting

The accessibility lead will report regularly to the leadership team. Accessibility is an integral component of Toronto Seniors Housing Corporation's business, and metrics on accessibility improvements will be reported regularly to the Toronto Seniors Housing Corporation Board of Directors and annually through the annual report.

### Related Legislation, Regulations, and TSHC Policies:

- *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11*
- *Employment Standards Act, 2000, S.O. 2000, c. 41*
- *Human Rights Code, R.S.O. 1990, c. H. 19*
- *Integrated Accessibility Standards, O. Reg. 191/11*
- *Ontario Building Code, O. Reg. 332/12*
- TSHC Accessible Customer Service Policy
- TSHC Hiring Policy
- TSHC Human Rights Policy – staff
- TSHC Human Rights, Harassment & Fair Access Policy – tenants
- TSHC Workplace Accommodation Policy

### Amendments (Revision History):

NA

### Next Scheduled Review Date:

This policy will be reviewed once every five years.

**Policy Contact**

Director, Strategy and Business Management