



# Accessibility Policy

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<b>Policy Owner:</b>	Public Affairs
<b>Approval:</b>	Board of Directors
<b>First Approved:</b>	June 2004
<b>Effective Date:</b>	July 29, 2015

## Organizational Statement of Commitment

Toronto Community Housing is committed to providing an inclusive environment to residents and employees with disabilities in accordance with the core principles of accommodation, dignity, independence, integration and equal opportunity outlined in the *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, the *Integrated Accessibility Standards*, O. Reg. 191/11 and *Accessibility Standards for Customer Service*, O. Reg. 429/07. Toronto Community Housing recognizes the need to identify and remove barriers faced by people with disabilities, and will achieve greater accessibility by aligning with a culture that recognizes the dignity and worth of every individual.

## Policy Statement

This policy provides an overview of all of Toronto Community Housing'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 Community Housing's commitment to accessibility extends beyond legislative compliance. As Toronto Community Housing continues to achieve accessible social housing and employment, this policy requires Toronto Community Housing staff to incorporate best practices in accessibility through all aspects of its business. Toronto Community Housing will engage and consult with stakeholders, residents 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:

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness;
- (b) a condition of mental impairment or developmental disability;
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoke language;
- (d) a mental disorder; or
- (e) 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 executive lead:** the member of the Executive Leadership Team who has been designated as the lead for this policy and all related accessibility initiatives.

**Toronto Community Housing staff:** all Toronto Community Housing employees, whether full or part-time, temporary or permanent including secondees.

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



## Scope

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

## Core Principles

In keeping with our values of respect, accountability, community collaboration and integrity, Toronto Community Housing will implement this policy in accordance with the following principles:

**Dignity** – Residents 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** – Residents and staff with disabilities will be provided the same access our programs, services, opportunities, and facilities as all other residents and staff.

**Integration** – Residents 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 residents and staff. An emphasis on inclusion will focus on eliminating barriers for people with disabilities.

## Governance and Legislation

Toronto Community Housing 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 in order to remove or prevent barriers for Ontarians with disabilities<sup>1</sup> by 2025. For details on Toronto Community Housing's compliance with the

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<sup>1</sup> The AODA uses the same definition of disability as the *Ontario Human Rights Code*, which includes disabilities of differing severity, both visible and non-visible, as well as permanent and transient disabilities. See *Guide to the Accessibility Standards for Customer Service*, Ontario Regulation 429/07, Accessibility Directorate of Ontario, January 2008.



AODA and associated legislation refer to the relevant policies as listed in the Policy Details.

### Accessibility Standards for Customer Service (ASCS)

The ASCS is an accessibility standard created under the AODA. Toronto Community Housing was required to comply with this regulation by January 2012. The Accessible Customer Service Policy was enacted by Toronto Community Housing in 2011 to guide staff in complying with this regulation. Toronto Community Housing has implemented the necessary policies, training, and practices to comply with these Standards.

### 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 Community Housing 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 Community Housing 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 Community Housing: 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 Community Housing tracks the implementation of the IASR in its multi-year Accessibility Plan. The plan is posted on Toronto Community Housing'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 Community Housing 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 residents and meet legislative requirements by 2025.

## Accessibility Focus Areas

### **1.0 Accessible Customer Service**

Toronto Community Housing 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.

**1.1 Accessible Customer Service Policy:** complies with the ASCS and outlines our commitment to provide customer service that is inclusive, barrier free and meets the unique needs of persons with disabilities.

**1.2 Communication Standards/Accessible Formats and Communications Supports:** outlines the standards that Toronto Community Housing follows in all communications to residents. These standards include the Information and Communications Standards as outlined in the IASR.

**1.3 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.

**1.4 Self-Service Kiosk Standards:** Toronto Community Housing will ensure accessibility for persons with disabilities when designing, procuring and acquiring self-service kiosks, as indicated in the IASR.

**1.5 Tenant Transfer Policy:** formalizes Toronto Community Housing's commitment to priority transfers of persons who have a medically documented need for accessible accommodation.

**1.6 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.

## **2.0 Accessible Homes**

Toronto Community Housing will ensure that residents 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.

**2.1 Accessibility in the Built Environment Policy:** This policy includes standards for new construction as well as standards for modifying units, common spaces, and entire buildings. This policy and the associated procedures and standards include components that surpass the OBC in an effort to meet the duty to accommodate requirements of the OHRC and to provide practical, functional accommodations to currently used mobility devices. Toronto Community Housing adheres to the OBC at a minimum.

**2.2 Accessibility Program: Capital Planning:** Outlines the planning and implementation process for planned capital improvements.

**2.3 Accessibility Program: Resident Request Unit Modifications:** includes standards and a process for accessibility-related unit modifications based on resident request and documented medical need

## **3.0 Accessible Workplaces**

Toronto Community Housing 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.

**3.1 Hiring Policy:** Outlines Toronto Community Housing'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.

**3.2 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.



### **3.3 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 Community Housing is aware of the need for accommodation due to the employee's disability. This will be prepared as soon as practicable after Toronto Community Housing becomes aware of the need for accommodation due to the employee's disability. A detailed process can be found as part of Toronto Community Housing's Workplace Accommodation Policy.

**3.4 Workplace Accommodation Policy:** Facilitates effective responses to accommodation issues that arise in the workplace and ensures Toronto Community Housing meets its duty to accommodate under the OHRC.

## ***4.0 Supports for Policy Implementation***

**4.1 Staff Training:** Toronto Community Housing will ensure that accessibility training is provided to all employees, volunteers, persons who participate in developing our policies, and all other persons who provide goods, services or facilities on behalf of the company.

The training will consist of:

- a) the requirements under the IASR;
- b) the parts of the OHRC that pertain to people with disabilities;
- c) the requirements under the ASCS.

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

**4.2 Resident & Staff Engagement:** Toronto Community Housing will consult and work with residents with disabilities and stakeholders in the development of the above accessibility policies, plans, and programs. Toronto Community Housing will consult with appropriate stakeholders, which may include residents with disabilities, tenant councils, resident accessibility advocacy groups, experts in the field of accessibility, and Toronto Community Housing staff when undertaking formal reviews of this policy and any other Toronto Community Housing policies related to Accessibility.



**4.3 Procuring Goods and Services:** Toronto Community Housing's Procurement Department will ensure that the procurement process is inclusive and that accessibility considerations and requirements are incorporated throughout the procurement cycle, including the planning and document development stages, except where it is not practical to do so. Where it is impractical to incorporate accessibility into the procurement process, the Procurement Department will provide an explanation upon request. The Procurement Department will also ensure that all selected vendors are aware of the need to provide accessible goods and services to Toronto Community Housing, and will require AODA compliance from vendors who are so such legislatively bound.

## Compliance and Monitoring

### ***Accessibility Reviews***

All new or revised policies and procedures will be reviewed by Legal Services to ensure legislative compliance.

When developing, revising and implementing Toronto Community Housing's policies and strategies, authorized Toronto Community Housing 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 Executive Lead report regularly to the Executive Leadership Team. Accessibility is an integral component of Toronto Community Housing's Strategic Plan, and metrics on accessibility improvements will be reported through quarterly performance reports to the Toronto Community Housing Board of Directors and annually through the annual report.

## Governance and Legislation

- *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11*
- *Accessibility Standards for Customer Service, O. Reg. 429/07*



- *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

## Commencement and Review

Revision	Date	Description of changes	Approval
First approval:	2004	<b>New</b> (Accessibility for Residents with Disabilities Policy)	Board of Directors
Revision #1	tbc	Complete policy revision and renaming.	
Last review:	See above	n/a	

**Next Scheduled Review Date: July 2017**