Policy Management Framework

Introduction

The policy management framework governs all policies and procedures for Toronto Community Housing. This framework supports a consistent approach to policy management across the corporation by:

- Explaining the triggers for the development of new policies or the review of current policies;
- Mandating regular reviews to ensure policies are current;
- Outlining the roles and responsibilities of all divisions involved in policy review;
- Explaining the standards and expectations for policy review, implementation and communication processes; and
- Explaining how the policy index, policy standards and quality control processes are centrally administered.

Definitions and criteria

Policy is a clear and high-level statement of intent and helps guide decisions and actions to achieve a desired outcome – it is the “what”. Policies are needed to:

- Protect the corporation legally,
- Keep the corporation in compliance with governmental policies and laws,
- Establish consistent work standards, rules, and regulations, and
- Provide consistent and fair treatment for staff, tenants or others.
Procedures are a series of steps that must be taken to accomplish the goals set out by a policy – it is the “how”. Procedures generally support a particular policy, though in some cases they may stand alone. Procedures are needed to:

- Provide specific actions, steps, or instructions that staff have to follow,
- Ensure consistent and comprehensive application of a policy,
- Enable detailed interpretation and application of the policy,
- Allow for regular operational updates/revisions that do not require higher levels of approval, and
- Clearly demonstrate what to do at each step to ensure successful implementation.

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

Standards are specific and mandatory controls that support a policy and compliance is mandatory. Standards are normally measurable and enable a uniform method of support for a policy. Standards may be integrated into a policy or may stand alone.

Guidelines provide details that aid in interpreting a procedure and are usually recommended but not mandatory. They are used when a policy may be applied differently across different divisions. Guidelines often provide suggested actions and involve discretionary usage. They are also used to aid in policy interpretation and to form a body of decision-making history and case examples.

Protocols are a code of correct and proper conduct, often used when two or more divisions are involved, that detail the roles and responsibilities of the roles involved.

Note: the use of protocols will generally be phased out and replaced by “procedures” as part of policy reviews in 2014/15.
Policy Types and Approval Levels

Policy Type: Board Policy
Approval Level: Board of Directors

Criteria:
1. Stipulated by legislation, by-laws, the shareholder direction or other such framework or compliance requirements,
2. Address a major risk area (financial, reputational, etc.), or
3. Significant impact on many tenant households or on vulnerable tenants.

Board Policies require the approval of the board of directors and the appropriate board committee in addition to the Executive Leadership Team (ELT) and the divisional executive. Associated procedures do not require board approval though may be attached for information when the policy is brought forward for approval.

All policies brought forward for approval must be accompanied by a briefing note that outlines relevant background/context, major changes proposed, anticipated impact and significant resources required, and the implementation plan (template in Appendix 3).

Policy Type: Corporate Policy
Approval Level: Executive Leadership Team

Criteria:
1. Enterprise-wide or multi-divisional impacts with significant resource implications,
2. Required to demonstrate compliance with external requirements, or
3. Substantial impact or change that affects most employees.

Corporate policies require the approval of the Executive Leadership Team in addition to the divisional executive. Associated procedures may be attached for information although ELT approval is not required.
All policies brought forward for approval must include a briefing note as described in the board section (above).

**Policy Type:** Divisional Policy  
**Approval Level:** Divisional Executives

**Criteria:**
1. Operational and transactional business of a single division.

Divisional policies and the associated procedures require the approval of the divisional executive. When a new divisional policy to Toronto Community Housing is introduced, or there are very significant changes to current direction, the ELT must be briefed on the change.

Divisional executives are authorized to approve minor updates and changes to policies outside of the regular policy review process (as per process in “Minor Updates” described herein).

---

### Summary of Policy Types and Approval Levels

<table>
<thead>
<tr>
<th>Policy Type</th>
<th>Board*</th>
<th>ELT</th>
<th>Divisional executive</th>
</tr>
</thead>
<tbody>
<tr>
<td>Board policy</td>
<td>A</td>
<td>A</td>
<td>A</td>
</tr>
<tr>
<td>Board policy - procedures</td>
<td>I</td>
<td>A</td>
<td>A</td>
</tr>
<tr>
<td>Corporate policy</td>
<td>A</td>
<td>A</td>
<td>A</td>
</tr>
<tr>
<td>Corporate policy – procedures</td>
<td>I</td>
<td>A</td>
<td>A</td>
</tr>
<tr>
<td>Divisional policy</td>
<td>I</td>
<td>A</td>
<td>A</td>
</tr>
<tr>
<td>Divisional policy - new / major changes</td>
<td>I</td>
<td>A</td>
<td>A</td>
</tr>
<tr>
<td>Divisional policy – procedures</td>
<td>I</td>
<td>A</td>
<td>A</td>
</tr>
<tr>
<td>All policies/procedures: minor updates</td>
<td></td>
<td></td>
<td>A</td>
</tr>
</tbody>
</table>

A = for approval  
I = for information  
*“Board” approval includes the relevant board committee*
Timelines

Policy Reviews
A standard timeline for the review of a Board policy would be an average of 5 months from initiation of the review to Board approval. A standard timeline for the review of a corporate policy would be an average of 3 months from initiation of the review to Executive Leadership Team approval.

Timelines may be longer or shorter depending on the complexity of the policy revision and the nature of stakeholder consultations. Policies requiring resident consultations or Joint Health & Safety Committee review will have longer timelines.

Timelines will be established jointly at the outset of each policy review by Strategic Planning & Stakeholder Relations (SPSR) and the policy owner according to the review schedule.

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

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

Sample Timeline

<table>
<thead>
<tr>
<th>Drafting and consultations (internal and external)</th>
<th>1 – 3 months</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legal and SPSR review</td>
<td>3 weeks</td>
</tr>
<tr>
<td>Due to ELT</td>
<td>1 week before ELT meeting</td>
</tr>
<tr>
<td>ELT review meeting</td>
<td></td>
</tr>
<tr>
<td>Due to Board committee</td>
<td>1 month before committee meeting</td>
</tr>
<tr>
<td>Board committee review</td>
<td></td>
</tr>
<tr>
<td>Due to Board</td>
<td>1 month before board meeting (may be somewhat concurrent w/ above)</td>
</tr>
<tr>
<td>--------------------------------------------------</td>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td>Board review</td>
<td></td>
</tr>
<tr>
<td>Implementation</td>
<td>1-2 months+</td>
</tr>
</tbody>
</table>

**Roles**

**Strategic Planning & Stakeholder Relations** (SPSR) is the owner of the policy management framework, and is responsible for:

- Scheduling and managing Board and corporate policy reviews and facilitating approvals and monitoring divisional policy reviews,
- Providing direction and performing quality control,
- Ensuring consistent application of the framework and strategic plan,
- Leading the policy development process when there is no clear policy owner,
- Administration related to the framework, and
- Managing the review schedule and sharing with ELT and Board committee annually.

Policy Owners are divisions represented by **divisional executives** that are the primary subject matter expert and are responsible for:

- Developing policy content and managing implementation,
- Ensuring policies are complete and up to date,
- Identifying the need for new or revised policies, and
- Adhering to standards set out in the policy framework.

For Board and corporate Policies:

- **Legal Services** reviews each policy for risk and compliance issues,
- **Strategic Communications** develops communications plans and reviews for style, and
Learning & Organizational Development provides guidance on change management and identifies organizational learning needs. If required and appropriate, develops education content based on final policy documents.

For divisional policies:

- Policy Owners are required to consult with Legal Services, Strategic Communications and Learning & Organizational Development as required regarding implementation of the policy and procedures.

**Policy Development or Review Triggers**

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

**Minor updates**

Minor updates and revisions may be needed from time to time. In those cases, the policy owner will work directly with SPSR to make revisions. Ideally, such revisions would be tracked and accumulated throughout the year and updates only made once a year to the policy. Minor updates may be made directly in the policy and finalized with divisional executive approval. The ELT and affected groups (staff, tenants, and/or stakeholders) should be notified of the update.
Updates to procedures may be made directly and more frequently as business requirements change. These changes require divisional executive approval.

**Retiring policies**

From time to time, business or other requirements may change and a policy may no longer be required. Two scenarios are likely to occur:

1. If a policy is being **replaced** – the retirement of the policy must be noted at the end of the new/replacement policy by stating “this policy replaces the former [name of policy], retired on [date].” The briefing note to ELT or the Board must include a note about policies being retired.

2. If a policy is **no longer required**, SPSR will file all related documents in the policy index in the “inactive/retired” folder and will note the date of retirement on the front page of the policy.

**Policy compliance**

All managers are accountable for ensuring that their staff are aware of the policies and procedures applicable to their work.

All employees are responsible for being knowledgeable about the policies and procedures that are applicable to their work.

As required by the nature of the policy, employees may be required to attest or certify that they have reviewed key policies. Attestations and certifications are managed by the policy owner in consultation with legal services and SPSR as required.
Policy and procedure administration

- SPSR maintains a policy index and Microsoft Word and Adobe PDF copies of all final board and corporate policies and procedures and all final divisional policies.
- All final Board and corporate policies and procedures and all final divisional policies are stored on inHouse.
- SPSR is responsible for maintaining the “Policies” page in consultation with policy owners.
- Select policies that are of interest to external audiences and policies that apply to Toronto Community Housing residents are also posted on the external website.

Commencement and review

<table>
<thead>
<tr>
<th>Revision</th>
<th>Date</th>
<th>Description of changes</th>
<th>Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial approval</td>
<td>November 2011</td>
<td>Guide to Policy Development, Review or Amendment (new document)</td>
<td>Divisional Executive</td>
</tr>
<tr>
<td>Revision #1</td>
<td>June 24, 2014</td>
<td>Changed name to Policy Framework and expanded scope of document</td>
<td>ELT</td>
</tr>
</tbody>
</table>

Appendix 1: Policy index and review schedule
Appendix 2: Checklist for policy owners
Appendix 3: Templates – Policy, Procedure, Briefing Note
Policy Framework - Appendix 2:  
Policy Development and Review - Checklist for Policy Owners

☐ **Project scope:** Strike a policy review team, clarify roles/responsibilities and work with SPSR to develop a workplan based on the policy review schedule

☐ **Consultations:** Consult with stakeholders (staff, tenants or external) – degree of consultations should match expected degree of impact, risk and change

☐ **Research best practices:** Check related City of Toronto policies and City Auditor General reports and recommendations as well as research industry best practices

☐ **Policy writing:** Draft new policy or changes to existing policy using policy templates

☐ **Change management & Learning Needs:** Partner with Learning & Organizational Development to determine appropriate change management approach and identify learning needs.

☐ **Feasibility assessment:** Check feasibility and available resources to ensure there are adequate operational, financial and administrative supports and processes in place

☐ **Implementation plan:** Work with other divisions and units to develop an implementation plan, e.g.:
  o Strategic Communications - communications plan
  o Learning & Organizational Development - staff education, content development
  o Business Efficiencies Unit and ITS – business process mapping and data/system requirements
  o Legal Services and Internal Audit – monitoring and compliance
  o Other divisions as required

☐ **Quality control:** Submit the policy to SPSR for quality control

☐ **Legal review:** Submit to Legal Services to review for risk and compliance issues

☐ **Briefing note:** Write a briefing note to accompany the policy for the approvals process

☐ **Approvals:** Work with SPSR to submit policy to Executive Leadership Team and, when applicable, Board of Directors for approval

☐ **Posting:** SPSR posts approved policy on inHouse or the external website

☐ **Implementation:** Manage implementation according to plan

*Note: this checklist does not account for the development of procedures, forms or templates. When these are required, they may be developed in conjunction with the policy or written after, though best practice would be to draft them alongside the policy.*