



# Accessibility in the Built Environment Policy

**Policy owner:** Facilities Management

**Approval:** Board of Directors

**First approved:** December 3<sup>rd</sup>, 2015

**Effective date:** December 11<sup>th</sup>, 2017

## Policy Statement

Toronto Community Housing is committed to working with tenants to create and maintain buildings and properties that are accessible and inclusive so that everyone can equally participate in their communities. To do this, Toronto Community Housing will:

- bring its buildings up to the Toronto Community Housing Building Standards for Accessibility, over time, while continuing to address tenants' needs as they arise on a case-by-case basis ("Building Standards");
- monitor and upgrade its buildings and properties on an ongoing basis to meet tenant needs and meet legislated requirements, and will prioritize practical accessibility considerations;
- be proactive when making decisions and allocating budget resources related to the built environment.

This policy guides Toronto Community Housing in providing functional, practical accommodations while working together with tenants to meet their accessibility needs. These needs include ambulatory needs, needs related to vision and hearing impairments, mental health needs, and other needs required to accommodate a disability as defined by the Ontario *Human Rights Code*, including accommodation for currently used medical devices. Toronto Community Housing is committed to working with tenants with disabilities and tenant accessibility advocacy groups (for example, the Responsible Personal Accessibility in Toronto Housing (R-PATH) tenant-led committee) in all aspects of delivering accessibility in the built environment, including the establishment and revision of the Building Standards.



While one purpose of this policy is to work towards ensuring ensure compliance with the Ontario *Human Rights Code*, the *Accessibility for Ontarians with Disabilities Act*, and the Ontario *Building Code*, Toronto Community Housing is committed to going beyond these requirements to address the full scope of tenants' accessibility needs, including needs related to vision and hearing impairments, and mental health issues. Regulatory compliance and the commitment to going beyond such requirements will be achieved over time as part of an ongoing process that will be diligently implemented.

## Scope

This policy applies to all Toronto Community Housing properties, including the design and construction of new buildings, existing building common and outdoor spaces, revitalization and refurbishment projects, and in-suite modifications. It applies to Toronto Community Housing residential, commercial and general support/administration spaces.

## 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:

- 1) Aim to provide practical and functional accommodations in all new, revitalized, and refurbished buildings, and in existing buildings where structurally possible.
- 2) For existing buildings and communities, prioritize accommodations based first on safety; second on tenant, community, or staff request; and third on audit information.
- 3) Collaborate with tenants, including tenant advocacy groups (for example, R-PATH) and tenants with disabilities to ensure renovations, refurbishments and new buildings are barrier-free, and to remove barriers in existing buildings. Toronto Community Housing will work one-on-one with tenants to establish appropriate accommodations that meet their needs, including tenants who may have specific medical requirements.
- 4) Provide safe, practical, and functional in-suite modifications to meet tenants' needs as efficiently as possible, and provide a transfer process to meet tenants' medical needs where current units cannot be sufficiently modified.



- 5) Deliver accountability and transparency through regular monitoring and reporting to the Board of Directors against targets and goals.

## Definitions

**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 spoken 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 sched. 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.)

**Hearing/sight accommodated units:** Any residential unit that has been modified with medical equipment or technology to accommodate a tenant with a visual or hearing impairment (with medical documentation and submitted/approved through the Toronto Community Housing accommodation request process).

**Wheelchair/mobility unit:** Any residential unit that has been designed, built or modified to accommodate someone with physical disabilities who is medically required (supported by medical documentation and submitted to the Toronto Community Housing Accessibility Program) to use a mobility devices to meet their mobility needs. These units will meet all legislated requirements and Build Standards. Medical mobility devices may include a walker, a manual or electric wheelchair, a mobility scooter, or any other device that would create a need for a clear path of travel at least 914.4 mm wide.



## Policy Details

This policy provides an overall direction for how Toronto Community Housing approaches accessibility in the built environment. It describes Toronto Community Housing's commitment to working with tenants:

- to find appropriate solutions for individual tenants;
- to ensure barriers are being removed in existing buildings; and
- to ensure that new, revitalized, or refurbished buildings are barrier-free.

It also outlines Toronto Community Housing's approach and commitment to providing practical and functional design in all buildings, where structurally possible, and to transparency and accountability through regular reporting.

In existing buildings where modification is not practical because of structural and/or building service constraints, a transfer process will be made available to tenants to enable them to move to a unit that meets their needs.

The policy will be applied using the Building Standards.

The financial requirements of this policy will be implemented through Toronto Community Housing's annual budget. The categories of the accessibility budget are:

- Planned capital, common spaces in buildings with 200 or more units;
- Planned capital, common spaces in buildings with fewer than 200 units;
- On-demand common spaces;
- In-suite modifications;
- Infrastructure – audits and database requirements; and
- Development – incremental upgrades on new builds.

The first four categories are permanent features of the accessibility budget. 'Infrastructure' and 'Development' may change and/or other categories may be added dependent on needs.

## ***Building Standards***

Toronto Community Housing will monitor, update, and implement procedures and standards for new developments, refurbished or revitalized communities and existing buildings on an on-going basis. Toronto Community Housing will review any Building Standards upon request from and in collaboration with tenants and tenant advocacy groups (for example R-PATH). Toronto Community Housing Building Standards will



strive to meet the needs of currently used mobility devices and always default to the Ontario *Building Code* as a minimum standard. The Building Standards will be upgraded on an ongoing basis as equipment, products and devices are upgraded or made available in the market.

The applicable standards will vary by building type (new/renovation/commercial/administrative), but they will follow the same principles as described in this policy and in the Building Standards.

### ***Build Ratio***

- For all existing revitalization sites (as of year-end 2017), 4% of units in new buildings are built to Toronto Community Housing's accessibility standards.
- For all new revitalization sites (as of year-end 2017), 9.5% of units in new buildings are built to Toronto Community Housing's accessibility standards. By 2020, this ratio will increase to 15% of all units in new buildings.
- Where returning relocated households in revitalization sites do not require accessible units, Toronto Community Housing will accommodate the build ratio through retrofits of existing vacant units throughout the broader portfolio where the demand exists.
- For new buildings where 100% of the units are net new to the portfolio, 15% of units are built to Toronto Community Housing's accessibility standards.
- Toronto Community Housing will keep a log of all existing units that are modified to Toronto Community Housing's accessibility standards, in both revitalization sites and the broader portfolio.

### ***Accessibility Design Reviews***

Toronto Community Housing will review accessibility projects on an ongoing basis. Facilities Management, Development, and tenant accessibility advocacy groups (for example R-PATH) will review projects before construction.

The Facilities Management Design and Engineering unit will review projects at the design stage to ensure compliance with legislation and Toronto Community Housing's Building Standards. The Facilities Management Operations unit will review projects during construction. A tenant advocacy group (currently R-PATH) will conduct a review at the completion of the project, at the request of a tenant, a tenant body, Toronto Community Housing, or at will.



Tenants with disabilities who live in the community where the work is being done will also be consulted at the start and the end of projects.

When developing new buildings or renovating/refurbishing existing properties, Toronto Community Housing will apply the Toronto Community Housing Building Standards as updated from time to time. Toronto Community Housing will also consult with tenant advocacy groups, external agencies, and internal divisions where appropriate. Such efforts will consider and address accessibility, with a particular focus on removing barriers faced by people with disabilities and ensuring the principles of dignity, independence, integration, and equality of outcomes are upheld.

### ***Emergency Response***

As part of the implementation of this policy, Toronto Community Housing maintains an Emergency Response Procedure for tenants with disabilities. This procedure outlines how tenants with disabilities will be accommodated in emergency situations including, but not limited to:

- full building elevator malfunctions;
- fires;
- floods;
- long-lasting power outages; and/or
- Acts of God.

The specifics of the Emergency Response Procedure can be located within the Emergency Response Plan.

### **Compliance Monitoring and Reporting**

Since accessibility is an area of focus for Toronto Community Housing, accurate and regular monitoring and reporting are necessary.

Facilities Management - Design and Engineering will ensure projects are compliant with the Building Standards and all legislative requirements.

Development will maintain a log of all accessible units that are built or retrofitted as part of revitalization.

The Vice President, Facilities Management will recommend to the Board the Capital budget for accessibility upgrades as part of the annual capital budget approval cycle. Accessibility measures will also be reported annually through the Annual Report.



## Governing and Applicable Legislation

- *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11*
- *O. Reg. 429/07: Accessibility Standards for Customer Service*
- *O. Reg. 191/11: Integrated Accessibility Standards Regulation*
- *Ontario Human Rights Code, R.S.O. 1990, c. H.19*
- *O. Reg. 332/12: Ontario Building Code*
- *Employment Standards Act, 2000, S.O. 2000, c.41*

## Related Policies and Procedures

- [Accessibility Policy](#)
- Building Standards for Accessibility

## Commencement and Review

Revision	Date	Description of changes	Approval
First approval:	Dec. 3 <sup>rd</sup> , 2015	New	Board of Directors
Revision #1	Feb. 6 <sup>th</sup> , 2018	Addition of updated Board-approved Build Ratio; minor formatting changes; changed term “resident” to “tenant” throughout	VP of Facilities Management and VP of Development

**Next Scheduled Review Date: February 2020**