

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

## **Translation and Interpretation Policy**

**Policy Sponsor:** Director, Engagement, Partnerships, and Communications

**Approver:** Board of Directors

**Initial Approval Date:** May 18, 2022

**Date of Last Revision, if applicable:** N/A

**Effective Date:** September 29, 2025

### **Policy Statement**

This Policy explains Toronto Seniors Housing Corporation’s (TSHC) commitment to communicating with tenants in ways everyone can understand. The Policy also explains how we provide translation and interpretation services, including communication supports and accessible formats (see Definitions). These services help tenants be more involved and understand their housing better.

### **Policy Objectives**

The purpose of this Policy is to:

- help tenants understand things about their housing, like their lease, their rights, and what they can or need to do as a tenant
- help tenants join activities and get the services they need
- guide Toronto Seniors Housing Corporation staff on how to get translation and interpretation services for tenants, including communication supports and accessible formats

### **Scope**

This Policy applies to:

- content created by Toronto Seniors Housing, including documents, posters, and website content
- TSHC tenants who need translation or interpretation services, including communication supports, such as sign language, or accessible formats, such as braille
- TSHC staff helping tenants to find and understand information
- staff and members of the TSHC Board of Directors that need communication supports or accessible formats, such as sign language or braille.

## **Out of Scope**

This Policy does not apply to:

- content created by another organization
- TSHC staff who need translation and interpretation services for themselves, unless it is an accessibility request for a staff person with a disability
- translation and interpretation services for events or activities run or hosted by outside organizations
- translation and interpretation services for events or activities run or hosted by tenants

## **Definitions**

**Accessible formats:** Accessible formats, sometimes called alternate formats, are ways to present communications (like words, pictures, or videos) so that people who have a disability related to reading or understanding this material can still get the information. Examples of accessible formats include braille, large print, and audio.

**Auto-translation:** Changing written or spoken language into another language or format using a device or computer program. This happens without using a human translator. Examples include translation apps or other tools that let you change the language on a website.

**Communication supports:** Communication supports are ways for people with disabilities to access audio information visually. Examples of communication supports include sign language interpretation, captions, and plain language.

**Critical information:** Information that may affect the health or safety of TSHC tenants. It includes communication about planned or unplanned disruptions to TSHC's critical services, such as water and electricity.

**Critical services:** Services that need to continue without disruption. If not, there could be serious risks, like loss of life, injury, or property damage. These services should restart as quickly as possible after a disruption, based on emergency response practices, to ensure the health, safety, security, and well-being of TSHC tenants. Examples of critical services include water, electricity, and fire alarm systems.

**Customer Relationship Management (CRM) language data:** Tenant language information in the CRM system. Tenants usually give this information when they sign their lease or at other meetings with staff, such as for annual rent reviews. For the purposes of this Policy, TSHC will review this data once every year.

**First language:** The language a person uses most often or feels most comfortable using to communicate.

**Interpretation:** Changing spoken words from one language to another. This includes sign language and other communication supports. It is a back-and-forth process that lets people who speak different languages talk with each other.

**Personal information:** As defined in the *Municipal Freedom of Information and Protection of Privacy Act*, it includes recorded information about a person that could identify them.

**Plain language:** Information written, organized, and designed so that it is very clear. This helps people easily find what they need, understand it, and use that information.

**Regional staff:** TSHC staff who work directly in tenant buildings or at one of the four regional offices.

**Tenancy information:** Information a tenant needs to know about their lease, their rights, and what they can or need to do as a tenant.

**Translation:** Changing written words from one language into another, including accessible formats such as braille.

## **Roles and Responsibilities**

**TSHC Communications Team:** Responsible for managing the Translation and Interpretation Policy. This includes coordinating all corporate-wide translation services. The Communications Team creates information about translation and interpretation services and tracks their usage.

**TSHC People and Culture Team:** Responsible for working with the Communications Team. Together, they create training and tools to help staff know how to use this Policy.

**Seniors Services Coordinator:** Responsible for helping tenants learn about the translation and interpretation services TSHC offers. They also show tenants how to find and use these services.

**Regional Staff:** Responsible for arranging translation or interpretation when tenancy information is needed in another language or format. They also print and put up English and translated posters from the Communications Team. They work with the Executive Business Program Coordinator to the Chief Executive Officer (CEO) to book interpreters for regional tenant meetings.

**Community Services Coordinator:** Responsible for working with the Executive Business Program Coordinator to the CEO and the Communications Team to set up translation and interpretation services for tenant planning meetings.

**Executive Business Program Coordinator to the Chief Executive Officer:** Responsible for making sure interpreters are scheduled to attend TSHC meetings and discussions with groups of tenants and staff. They book and keep track of

these interpretation services.

## **Policy Content**

### **Expectations**

Translation and interpretation services will focus on tenancy support and encouraging tenant participation. When it makes sense and is possible to do so, TSHC will use plain language and visuals to help tenants understand.

TSHC department staff will decide what critical information they need to translate for tenants. The Communications Team will advise on priorities, based on past translation requests, the type of information, and how long it will be needed.

Each year, TSHC will review the most common preferred languages and communication methods identified by tenants, including spoken languages and communication supports. TSHC will use the information in TSHC's Customer Relationship Management (CRM) system to identify this information. TSHC will look at information across the organization, as well as by region and by building, to help improve communication with tenants.

### **Translation services**

Staff will put up TSHC posters for tenants in English and the most common non-English language spoken by tenants in the building. Posters will use large print, plain language, and images to make them easier to understand. Staff may choose to post in more languages or accessible formats based on their knowledge of tenant needs in the building.

At any time, a tenant can ask for critical information in other languages or formats. Where a translation does not already exist, staff will have the information professionally translated or formatted to meet the tenant's needs within a reasonable time. The time it takes will depend on the availability of the right professional and how long and complicated the information is.

For non-critical information, TSHC will try to meet all translation requests, depending on time and budget. All requests for accessible formats or communication supports will meet or exceed provincial and federal legislated requirements.

Some technical and legal documents, like leases, can be hard to understand even if a person understands English. TSHC will provide plain language and interpretation supports as needed. Staff and any professional interpreters hired by TSHC will keep all tenant information private.

### **Translation for critical information**

Information about critical services will be translated by a professional translator into French and the most common 12 non-English languages used by tenants

across TSHC, based on the latest CRM language data, except:

- If a critical service only affects one or a few buildings, the information will be provided in English and the most common non-English language of that building. Staff may also use their knowledge of tenant needs to provide other translations or accessible formats.
- In emergencies, or when there is not much time, critical service information will be given immediately in English, with professional translations or accessible formats provided as soon as possible. Staff may use online or other digital auto-translation tools if needed.
- Tenants can ask for information about a critical service in any language or accessible format, and it will be professionally translated or formatted quickly.

TSHC will make every effort to make sure that critical information is clear and accessible.

TSHC department staff will identify critical information for translation based on tenant interactions. This is detailed in the procedures for this policy.

### **Interpretation services**

When TSHC staff host a community event, meeting, or consultation in a TSHC building, they must make sure that all tenants can participate. If a tenant asks, TSHC will try to provide a live interpreter, including sign language. Tenants must ask for an interpreter at least five business days before the event.

TSHC may also provide interpreters for corporate meetings or consultations at buildings based on staff knowledge of tenants' needs.

When staff meet with tenants privately, they can use tools like online translation (live or auto-translation) or phone interpreters to help tenants understand. Tenants can also get live interpreters 24/7 from TSHC's call-in services, like the Tenant Support Centre and the Community Safety Unit. Tenants who use a teletypewriter (TTY) device can access the Tenant Support Centre by dialing 711 to connect with a TTY relay operator. The operator will then place a call to the Tenant Support Centre on the tenant's behalf and facilitate the conversation. The Community Safety Unit offers a dedicated text message phone line for tenants who may have difficulty using a voice phone.

### **Requesting translation and interpretation support**

A poster is up in all TSHC buildings explaining how tenants can ask for translation and interpretation services. This includes accessible formats and communication supports. This poster is in English, French, and the 12 most common non-English languages spoken by tenants. Information about these services will also be in a tenant guide given to new tenants when they sign their lease. This [Tenant Welcome Guide](#) is available in 14 languages, including English, and posted on the

TSHC website. Tenants can also speak with staff in their building or contact the Tenant Support Centre to ask for translation and interpretation services.

The TSHC website can automatically translate its content into the top tenant languages, as well as French, using an auto-translation feature. Whenever possible, information will be in a format that works with this auto-translation feature, as well as with accessibility tools such as screen readers.

When outside organizations host events or programs for TSHC tenants, they are responsible for providing their own translation and interpretation. TSHC can help them by sharing our policies, design tips, and information about the languages spoken in specific buildings or by certain groups.

TSHC does not pay for translation and interpretation services for events or programs run or hosted by tenants. However, TSHC will try to provide materials to help. This could include poster templates for special events, guides for working with interpreters, and tips for making posters more accessible.

### **Translation and interpretation for all other types of information**

For information not mentioned above, the Department Head responsible will decide if translation or interpretation is needed, based on these factors:

- will translation or interpretation, including accessible formats and communication supports, help more tenants participate, understand and follow rules, or improve finding and participating in programs
- if tenants have asked for translation or interpretation for similar information in the past

### **Providing Services in French**

Toronto Seniors Housing Corporation recognizes its duty under the *Housing Services Act*, 2011, to provide housing-related services in both English and French.

### **Providing Services in Sign Language and Braille**

Toronto Seniors Housing Corporation acknowledges its responsibility under the *Accessibility for Ontarians with Disabilities Act*, 2005 (*AODA*) and its associated regulations, such as the *Integrated Accessibility Standards Regulation (IASR)*. In meeting these responsibilities, TSHC will provide information in accessible formats or using communication supports, including braille and sign language, upon request.

### **Training and Development**

Training and resources will be given to staff to help them apply this Policy and better support tenants whose first language is not English, or those who need accessible formats or communication supports. The training and resources will align with TSHC's Inclusion, Diversity, Equity, and Accessibility efforts and related

policies.

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

- *Housing Services Act*, 2011
- *Accessibility for Ontarians with Disabilities Act*, 2005, SO 2005, c11
- *Human Rights Code*, RSO 1990, c H19; and
- *Residential Tenancies Act*, 2006, SO 2006, c 17.
- TSHC Tenant Human Rights Policy
- TSHC Accessible Customer Service Policy
- TSHC Accessibility Policy
- TSHC Privacy Policy

**Amendments (Revision History):**

Initial policy approved by the Board of Directors on May 18, 2022.

Policy reviewed in 2025, with the following revisions, approved by the TSHC Board of Directors on July 31, 2025:

- Updated scope
- Updated definitions
- Updated policy content

**Next Scheduled Review Date: 2030**

This policy will be reviewed once every five years.

**Policy Contact**

Manager, Communications and External Affairs

**Appendices**

- Procedures for the Translation and Interpretation Policy