## THE AGENCY FOR CO-OPERATIVE HOUSING

### **POLICY MANUAL**

DATE ISSUED: NUMBER: March 2023 2.3.1

REPLACING ISSUE OF: CROSS REFERENCE:

March 2021 1.2.2: Role of the Individual Director, 1.4.2 Ethical Conduct, 2.1: Client-Service and

Satisfaction Standards, 2.2: Bilingual Services,

2.4: Confidentiality and Access to

Information, 2.5: Privacy, 3.1.1: Human Resources

**REVIEW CYCLE:**2 years

AUTHORITY:
Board of Directors

DUE FOR NEXT REVIEW: SUBJECT:

March 2025 Communications

### 1. Introduction

The Agency's commitment to openness and accountability makes effective communication with clients, stakeholders and the general public an organizational priority.

This policy is concerned with the way the Agency communicates with clients—both our legal clients, such as CMHC, and the housing co-operatives whose agreements we oversee. The policy also addresses how we inform the general public about our work.

The policy complies with the terms of the Agency's service agreement with CMHC and complements Agency policies governing client-service and satisfaction standards, bilingual services, privacy, human resources, and confidentiality and access to information, all of which touch on matters associated with communication.

### 2. Standards

The Agency's communications will meet the following standards:

• We provide clients, stakeholders and the public with timely, accurate, clear and appropriate information about our policies, programs, services and initiatives.

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- We communicate promptly, openly and courteously with clients and other stakeholders.
- We honour the values of transparency and accountability to our clients and the general public by practising assertive disclosure in our communications, while respecting our obligation to protect private and confidential information.
- We ensure that our communications can be readily understood by making them available in English and French, as required by the Bilingual Services Policy, and by using various communication media and formats, including plain language and alternative media, to meet different needs.
- Our communications comply as necessary with the federal visibility requirements set out in the Agency's agreement with CMHC.

## 3. <u>Communications Media</u>

- 1.1 The Agency makes extensive use of electronic media to
  - deliver services to clients;
  - draw the attention of clients and stakeholders to resources available from the Agency;
  - bridge geographic distances between the Agency and our clients and stakeholders in different regions of Canada;
  - inform the public about the Agency and our operations; and
  - accomplish these objectives at reasonable cost.
- 1.2 The Agency employs the following communications media:
  - a bilingual public website that includes information about the programs we administer; resource materials to support our clients' business operations, building management and improved environmental sustainability; and information about the Agency, how we do business and how to reach us;
  - password-protected web pages, accessible to Agency clients and specific groups of external users;
  - electronic messaging that allows the Agency to alert co-operatives and stakeholders to new developments and new materials on our website;
  - videos posted on the Agency's YouTube channel;

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social-media accounts; and

- occasional printed materials.
- 1.3 An annual report published on our public website sets out our activities and achievements in the year and summarizes our annual audited financial statements.
- 1.4 A portfolio review produced every two years and published on our public website analyses the current and past performance of our whole client portfolio and of significant portfolio subsets.
- 1.5 An intranet accessible to staff serves as a portal to the Agency's electronic records and facilitates the sharing of news and the exchange of views among Agency teams and between staff and management.

## 4. <u>Communications with Co-operative Housing Clients and Other Stakeholders</u>

- 4.1 The Agency is committed to the prompt communication of all important information to client housing co-operatives and such other stakeholders as regional federations of housing co-operatives, property-management companies and the Co-operative Housing Federation of Canada.
- 4.2 When not communicating in person or by telephone through our staff, the Agency normally communicates by e-mail and through postings on our public and client websites. Print communications is infrequent.
- 4.3 The Agency maintains a toll-free telephone line to ensure that co-operatives can speak with the appropriate Agency staff at no expense.
- 4.4 In a timely manner, the Agency makes available to each client, through the client web pages, the client's Annual Information Returns, Risk Reports, Compliance Reports, Performance Reports, Property Inspection Reports, Plain Language Financials, and, where applicable, annual budget, rent-supplement reports, rental-assistance reports, Action Plans and monthly or quarterly monitoring reports.
- 4.5 The Agency uses the public web pages to supply clients and stakeholders with relevant news, information and resources drawn from internal and external sources.
- 4.6 Confidential information respecting our client housing co-operatives is posted only to the client web pages.

# 5. <u>Communications with the Public</u>

5.1 Our public website serves as the Agency's normal communication medium with the general public.

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5.2 Guided by our policies governing privacy, confidentiality and access to information, the Agency responds promptly and courteously to enquiries from residents of housing co-operatives, people seeking residency and the general public. Unless already publicly available through our website, requests for copies of special reports and commentary on aggregated portfolio data are referred to the Director, Operations or the Chief Executive Officer. Requests for information of other than a factual nature are referred to CMHC for response, as the Agency's service agreement with CMHC requires.

# 6. <u>Federal Visibility</u>

- 6.1 The service agreement between CMHC and the Agency has certain provisions intended to ensure that the federal government remains visible to the public and program clients, whatever the assignment of roles and responsibilities for its co-operative housing programs. These provisions do not affect Agency correspondence with clients related to our program-management services. However, publicity materials or information directed to the general public, co-operatives or members of co-operatives on any other matter must contain a CMHC-approved reference to the role and support for the programs provided by the federal government through CMHC.
- 6.2 The CMHC name, logo and other symbols may not be used without CMHC's written consent. When permission is given, their use must comply with CMHC's branding guidelines.
- 6.3 The Agency and its representatives are free to deliver speeches, post signs and distribute announcements, news releases and notices of public events, written and electronic, about factual, programmatic matters. However, CMHC must first approve public communications in any form about any other matter coming under the service agreement or relating to CMHC. The agreement with CMHC obliges the Agency to submit communications requiring its approval 15 days in advance.

# 7. <u>Communications and the Board</u>

- 7.1 The Agency provides CMHC with access to approved minutes of meetings of the Board and its committees through the client website.
- 7.2 When a confidential matter comes before the Board, the discussion and any decisions are recorded in a confidential addendum to the minutes of the meeting. The addendum is distributed only to directors, the Corporate Secretary, the CEO and any others on a strict need-to-know basis. Directors and Agency staff are expected to exercise discretion in discussing these matters beyond the Board.
- 7.3 Directors will conduct all communications in accordance with the expectations set out in the Role of the Individual Director Policy.

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7.4 Documents for the Board Meeting are available on the Board Launchpad and in other ways, as directors may request.

### 8. Issues Management

- 8.1 Before launching any major initiative, management will arrange for the development of a communications plan to support it. The plan may involve outreach directed to different audiences over varying periods of time and will normally include a scheduled evaluation of whether the plan was effective.
- 8.2 Agency staff will follow the Agency-CMHC communications protocol when responding, or preparing to respond, to the news media or any elected official seeking information that concerns CMHC or services delivered under the Agency's agreement with CMHC.
- 8.3 In matters that do not concern CMHC, the CEO or a designate acts as the Agency's public spokesperson. When the Board's voice needs to be heard, the president of the Agency or a designate speaks on the Board's behalf.

# 9. Communications and the Agency's Workforce

- 9.1 The Agency's workforce consists of management, temporary and permanent employees and occasional casual labour. Full and open communication among staff and between staff and management will increase the commitment and organizational loyalty of staff and demonstrate that the Agency is true to its professed values.
- 9.2 The Agency's management and casual, temporary and permanent employees have full access to information about client housing co-operatives and the Agency's own operations, policies and resources.
- 9.3 The Agency makes available information about client housing co-operatives and the Agency to contractors on a need-to-know basis only.
- 9.4 Subject to the Agency's policies governing privacy and confidentiality, Agency staff may communicate freely with clients, stakeholders and the general public on all factual, programmatic matters. Without specific permission, staff must not attempt to answer any questions from news media or elected officials at any level of government about CMHC or about services coming under the agreement with CMHC. Any such questions will be referred to the relevant staff member listed in the Agency-CMHC communications protocol.
- 9.5 All communications made through an individual staff member's social-media account, such as Facebook or Twitter, are subject to the limitations in section 9.4 above, the Ethical Conduct Policy and the board-approved Human Resources

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Policy, whether or not the postings indicate that the staff member works for the Agency.

9.6 Members of the Agency's workforce are expected to keep their supervisor at the Agency informed about any emerging issues that could attract media attention. The supervisor will alert the Agency contact named in the Agency-CMHC communications protocol.

## 10. Communication of Financial Information about the Agency

- 10.1 CMHC and the Co-operative Housing Federation of Canada will receive a copy of the Agency's full audited financial statements and auditor's report each year.
- 10.2 Staff will refer to the CEO any requests for financial information not contained in the Agency's annual report. The CEO may exercise discretion in determining what information to share, while being mindful of the Agency's preference for openness.