

# North Centennial Manor

## Zero Tolerance of Abuse and Neglect Program

December 2<sup>nd</sup>, 2025

**Policy:** Our residents are vulnerable and may be at risk of abuse and neglect. We all have a duty to report suspected abuse or neglect of a resident.

Abuse can come in different forms such as verbal, sexual, physical, financial and emotional.

Neglect is also a form of abuse.

### **Policy Statement**

All residents have the right to live in a home environment that treats them with dignity, respect and is free from any form of abuse or neglect at all times, and in all circumstances.

The Manor is committed to zero tolerance of abuse or neglect of its residents. Corrective action will be taken against anyone who abuses a resident or anyone who fails to immediately report witnessed or suspected abuse once it becomes known that he/she has been withholding such information.

This *Zero Tolerance of Abuse and Neglect* policy must be communicated and displayed in the Manor, in a manner that is both highly visible and legible for all residents, staff and visitors.

### **Definition of Abuse and Neglect**

This policy uses the definitions of "abuse" and "neglect" from the LTCHA and its Regulation. These definitions are as follows:

- **"Abuse"** in relation to a resident, means physical, sexual, emotional, verbal or financial abuse
- **"Neglect"** means the failure to provide a resident with the treatment, care, services or assistance required for health,

safety or well-being, and includes inaction or a pattern of inaction that jeopardizes the health, safety or well-being of one or more residents.

### **Program for Preventing Abuse and Neglect**

The Manor's management staff and the Board of Directors will ensure that the home has a program that complies with the FLTCA 2021 and its Regulation for preventing abuse and neglect. The Home will ensure that the policy, definition and concept of abuse and neglect are reviewed with staff, volunteers, consultants and affiliates during orientation and training and annually thereafter.

The Manor's management staff will ensure that the policy to promote zero tolerance of abuse and neglect of residents is communicated to all staff, residents and residents' designated Power of Attorney (POA's).

### **Overview of Investigation & Reporting of Abuse and Neglect**

#### **Investigation and Reporting (including notification to POA)**

All Manor staff will ensure they take appropriate action in response to any suspected, alleged or witnessed incident of resident abuse or neglect as outlined in the *Procedures*.

#### **Who reports?**

- It is the duty of every Manor team member to report suspicious incidents witnessed or known otherwise centering on abuse or neglect of residents as soon as they became aware of it.
- Reporting to the administration of any incident is

mandatory, failure to do so will result in disciplinary action including and up to termination of employment.

How to report?

- All Manor team members who suspect, or have witnessed an incident of resident abuse or neglect must (1) report the incident in detail to the RN or the Supervisor on Duty, giving full details of what they know and have seen with regards to the incident, (2) fill out and submit an Incident Reporting Form. These forms are available at the east Nursing Station.

Who investigates the incident?

- The RN
- The Supervisor on Duty
- The Director of Care
- The Administrator

How to resolve the issue and report appropriately?

- Assess the resident(s) and note the type of abuse in question.
- Interview all the team members that are directly involved in the incident.
- Document as required.
- Inform all the appropriate people as mandated by Manor policies and Ministry legislation.

Refer to the Incident Investigation Form that can found at the east Nursing Station.

Following an Investigation, the Manor will notify the resident's POA, if any, and any other person the resident specifies:

Immediately upon the Manor becoming aware of an alleged, suspected or witnessed incident of abuse or neglect of the resident that resulted in physical injury or pain to the resident, or distress to the resident that has the potential to be detrimental to the residents' health and well-being; and

**When** becoming aware of any other alleged, suspected or witnessed incident of abuse or neglect of the resident.

Staff and board members must *immediately* report every alleged, suspected or witnessed incidents of:

- (a) Abuse of a resident by anyone, and
- (b) Neglect of a resident by the licensee, a staff member (or affiliate) of the Manor.

All Manor staff must follow **the** procedures for the reporting all alleged, suspected or witnessed incidents of abuse or neglect. The internal home reporting procedures are distinct and based on the organizational roles and responsibilities. The external reporting procedures are those procedures outlined in the FLTCA and its Regulation regarding the mandatory reports that must be made to the MLTC, using the Critical Incident System.

Staff must investigate immediately all reports by staff and board members under this policy, and third-party reports of abuse or neglect, in accordance with the investigation procedures.

A report shall be made to the MOHLTC Director with the results of every investigation conducted under this policy, and any action the home takes in response to any incident of resident abuse or neglect.

The report to the MLTC Director must meet the requirements in the FLTCA.

Staff must notify the resident and the residents' Power Of Attorney (POA), if any, and any other person requested by the resident of the results of the investigation immediately upon the completion of the investigation.

If the residents' Power Of Attorney (POA) is the individual being alleged of abuse, the home will ensure that this fact is included within the reports to the MLTC Director and the police (e.g. financial abuse) and the home is not required to advise the POA of the results of the investigation.

Staff must notify the Medical Director and Police. The notifications to the police are guided by reference to the criminal code offences such as theft or sexual abuse.

### **Mandatory Reporting**

Regulation requires certain persons, including staff members, to make an immediate report to the MLTC Director where there is a reasonable suspicion that the following incidents occurred or may occur.

- Improper or incompetent treatment or care of a resident that resulted in harm or a risk of harm to the resident.
- Abuse of a resident by anyone or neglect of a resident by the licensee or staff that resulted in harm or a risk of harm to the resident.
- Unlawful conduct that resulted in harm or a risk of harm to a resident.
- Misuse or misappropriation of a resident's money.

- Misuse or misappropriation of funding provided to a licensee under the LTCHA or the *Ontario Health*

**Reporting to the Ministry should not be taken lightly, hence, it is imperative that information is recorded truthfully, conclusively, and that the investigation and documentation be done in a timely manner.**

It is an offence to discourage or suppress a report of abuse or neglect, both internally in the home, or to the MLTC Director.

### **Consequences for those who Abuse or Neglect Residents**

The consequences for staff or board members who abuse or neglect a resident, or those who fail to report an incident or alleged abuse or neglect are serious.

### **Compliance with the Policy for Zero Tolerance of Abuse and Neglect**

The Manor staff will ensure that there is zero tolerance of abuse and neglect of residents and this policy and procedure will be evaluated for effectiveness annually and when an incident is suspected, alleged or has occurred. The findings will be used to determine what improvements (clinical, operational, environmental, financial \_management or training) are necessary to prevent further occurrences.

### **Prevention of Abuse and Neglect**

#### **Residents, Families and Power of Attorney Maker (POA)**

The Manor will ensure that residents, families and POAs are aware of and receive written information at the time of admission regarding the Resident Bill of Rights and the Policy of Reporting and Investigating Abuse and Neglect of Residents.

## Staff Education

The Residents' Bill of Rights and the Policy of Reporting and Investigating Abuse and Neglect of Residents will be reviewed with each new employee during orientation and annually thereafter.

The staff education and training will include:

Policy and Procedures for Reporting and Investigating Abuse and Neglect of Residents.

- Policy and Procedures on Reporting and Whistle-blowing Protection Against Retaliation and the Reporting and Complaints policy
- Policy and Procedures for Managing Complaints
- Policy and Procedures for Minimizing Restraining and Use of PASDs
- Training related to the following concepts:
  - Understanding the nature of employment in the Long-Term Care Home environment and how it demands an ongoing capacity for compassion and patience for residents.
  - Power imbalances in resident care and the potential for abuse and neglect by those in positions of trust.
  - Implementation strategies that promote trusting relationships and mitigate power imbalances.
  - Situations that may lead to abuse or neglect and how to avoid them and training related to the consequences for abusing or neglecting a resident or failure to report under this policy.

### Management staff

The Manor management staff shall:

Ensure that all staff and/or contracted individuals that provide **direct care to residents** students and volunteers have documented that they have read, understood, and agreed to this policy. This documentation will be required following initial orientation, annual re-training or other in-house educational events supported by the Manor.

- Maintain a tracking system to record the staff completion of the mandatory review of the policy.

## Reporting and Notifications about Incidents of Abuse or Neglect

### Reporting an Incident

All staff, volunteers, contractors that provide direct care to the residents and affiliated personnel are required:

- To fulfill their legal obligation **to immediately and directly report** any witnessed incident or alleged incident of abuse or neglect to the MLTC. Note: The Administrator or Director of Resident Care of the Manor are responsible for completing reports using Critical Incident System to the MLTC. This designate may make the MOHTLC report **together with** the person who witnessed the incident of abuse or neglect.
- To immediately, report to the Charge Nurse on duty (or on call) at the time of a witnessed or alleged incident of abuse or neglect.

During office hours, you may contact the Administrator of Director of Resident Care when in doubt.

- Maintain confidentiality regarding the report and names of all those involved in the incident.
- Fill out the Incident Reporting Form and drop it off at the Main Office and alert the administrative personnel.

### Whistle Blower Protection

A Manor staff member filing a report is protected under Whistle-blowing protection which forbids retaliation, or threats of retaliation, against a person for disclosing anything to an inspector or the MLTC Director, or for giving evidence in a proceeding under the FLTCA, or during a coroner's inquest. Employees, officers, and directors cannot discourage these disclosures. Staff will report any retaliation actions or threats of retaliation experienced related to the reporting of abuse or neglect.

### Management Staff

When an internal report from an employee on a suspected or alleged, or actual incident of abuse or neglect, they will assess the documented information. The Charge Nurse/ DOC will upon a satisfactory assessment, immediately report to the MLTC. This report is submitted by using the Critical Incident System (CIS).

**The Manor management staff will submit** a report to the MLTC **within 1 business day** using the Critical Incident System that includes, but is not limited to, the results of investigation and any action(s) taken in response to the incident. The report can be amended as needed.

The Manor management staff will report to the MLTC Director the results of every investigation the Manor conducts under this policy, and any action the home takes in response to any incident of resident abuse or neglect.

**The Ministry of Labour** may need to be notified if a staff member has been physically injured as a result of the incident.

**Workplace Safety and Insurance Board (WSIB)** will need to be notified if an employee was physically injured as a result of the incident. Please ensure policies and procedures for reporting a workplace injury are followed.

A Professional College must be reported to in writing, if the alleged person is a member of a professional College under the *Regulated Health Professions Act, 1991*), This duty to report does include a drugless practitioner under the Drugless Practitioners Act, and members of the Ontario College of Social Workers and Social Service Workers.

#### Notification to POA or any other person specified by the resident

The Manor staff must notify the POA, if any, or any other person specified by the resident immediately if the resident is harmed.

However, if the POA is the alleged perpetrator of the abuse there is no obligation to report to the POA any results of the investigation.

#### Reporting To Police

Staff must report to the police if the alleged, suspected or witnessed

incident of abuse or neglect constitutes a criminal offence under the Criminal Code.

### **Investigating and Responding to Alleged, Suspected or Witnessed Abuse and Neglect of Residents**

**Staff who are reporting** a suspected, alleged or witnessed incident of resident abuse or neglect:

- Intervene if safe to do so, or identify needed interventions (e.g., call 911) to ensure resident or staff safety and well-being, when an incident is occurring/or has occurred.
- Document or write a brief, factual note (e.g., not allegations or opinion) writing the details of the suspected, alleged or witnessed incident of abuse or neglect as soon as possible.
- Cooperate fully with those responsible for the investigation (e.g., home administrative staff, police, MLTC Inspector). Note: It is the right of an employee who witnesses or suspects alleged abuse or neglect to be accompanied by a co-worker (or legal or union representative) during the investigatory meeting.
- Seek supportive counseling or resources, if desired.
- Maintain confidentiality.

#### Management staff investigating the incident

Staff must investigate immediately all reports of abuse or neglect, in accordance with the investigation procedures set out in this

document.

During the investigation, this individual will need to consider:

- Whether the circumstances of the alleged, suspected or witnessed abuse or neglect meet the definitions within FLTCA. This includes a determination of whether the situation involved emotional and/or verbal abuse caused by a resident to another resident, was such that the resident causing either or both of these types of abuse understands and appreciates their consequences.
- Consider whether the incident relates to prohibited use of restraints.
- Who (which party) is the source of the report, including whether they are a resident, direct care or non-direct care staff member, board member, or third party (e.g., occasional employee, family member/significant person to a resident, volunteer, etc.).
- Whether the incident of abuse involved a physical injury to a resident, another resident, or a staff member. (Note: there may be reporting obligations to the Ministry of Labor if a staff member is injured.

Management Staff must:

- Maintain the security and integrity of the physical evidence at the site of incident, including documenting this evidence appropriately.

- Fully investigate the incident, and complete the documentation of all known details of the reported incident.
- Determine the appropriate management action(s) to be taken as a result of the findings of investigation (e.g., education, discipline, policy revision, mandatory reporting to relevant professional college).
- Enforce appropriate consequences for anyone responsible for abuse of a resident. (e.g., suspension, dismissal, discipline, reporting to the police, etc.)
- Provide debriefs to the appropriate parties (e.g., Board Chair, MLTC Inspector, the manor management team, staff members) as necessary.
- Cooperate with police investigation (if applicable) in consultation with the home's legal advisor.
- Maintain confidentiality regarding the report and names of all those involved in the incident.

Clinical Staff Responsible for Care of the Resident (s) harmed by the abuse or neglect

- Ensure the resident or residents are reassured and supported immediately in the appropriate manner to ensure their safety and security
- Provide interventions for the resident or residents who have been or allegedly abused or neglected and their roommates where appropriate.
- Ensure that the resident is not left in the responsibility of

the person alleged to have caused the abuse or neglect.

- Ensure safety and protection of staff and resident(s) involved, and all other residents that may be exposed to the risk of harm.
- Conduct a head-to-toe physical assessment on the alleged victim and document findings if physical abuse is alleged.
- Contact physician/NP if necessary, or other health practitioners for further assessment, treatment and follow-up, based on nursing assessment of injury, pain or suspected injury such as wounds, fractures or head injury.
- Document and communicate the status of the residents' health condition, further assessments arranged, and health investigation findings to the Administrator/Director of Resident Care.
- Offer information about resources to residents and families involved in the alleged incident such as social work counseling, legal advice, pastoral care, CCAC, Physician, and Psychiatrist.
- Maintain confidentiality regarding the report and names of all those involved in the incident.

Staff Member alleged to have caused the abuse or neglect must:

- Document details as soon as possible including dates, times, witnesses.
- Maintain confidentiality regarding the report and names of all those involved in the incident.
- Understand the consequences for being responsible for abuse or

neglect of a resident.

- Comply with human resources policies of the home.
- Cooperate fully with individuals or organizations responsible for the investigation.

And, he/she may also:

- Contact appropriate departments or organizations, e.g., human resource department, employee assistance program, union representative if applicable, legal advice as required.
- Seek supportive counseling if desired.

#### Administrator or Director of Resident Care

The Administrator or Director of Resident Care oversees the completion of all steps required by the policy and procedures, in order to manage the case to resolution.

- Ensure that, if necessary, the Board or Board Chair is informed.
- Oversee and ensure that reporting requirements to MLTC Director are undertaken.
- Ensure that the home's legal advisor has been contacted, particularly if the incident has the potential for lawsuit or criminal implications.
- Ensure that a copy of the documentation is stored within a secure area.

## **Management and Enforcement of Consequences**

Staff must ensure necessary actions are taken in response to any alleged, suspected or witnessed incident of resident abuse or neglect.

Anyone responsible for the abuse of a resident, or a staff member responsible for the neglect or the abuse of a resident may face any or all of the following management enforced corrective measures and or consequences:

- Retraining
- Discipline
- Dismissal
- Reporting to licensing body
- Charges under the criminal code

The Manor will communicate on a timely basis, the consequences applied to the person who has caused the abuse or the neglect to the resident, the POA or another person the resident specifies.

## **Evaluation Policy and Procedures**

### **Case Review**

The Manor management staff will evaluate the effectiveness of the policy for prevention of abuse and neglect when an incident has been alleged or has occurred and determine what improvements

(clinical, operational or training) are necessary to prevent further occurrences.

### Policy Review

The Manors' management and staff will evaluate the effectiveness of the policy for prevention of abuse and neglect at least once per year to identify what changes and improvements are required to prevent further occurrences. The results of the analysis of every incident of abuse or neglect are considered in the evaluation.

The Manors' management will maintain a written record of the abuse prevention policy and program review results, including the date of the evaluation, the name and relevant discipline of the individuals participating in the review, a summary of any changes arising from the review, and an action plan outlining the timelines for the implementation of the changes, and the date the changes or improvements were implemented.

The Manors' management staff will ensure that the identified changes and improvements are promptly implemented and documented consistently.

The following indicators may be measured to determine trends and assess the effectiveness of the prevention strategies:

- Number of incidents of alleged resident abuse/neglect.
- Number of incidents of proven resident abuse/neglect.

- Number of recurrences.
- Trends regarding types of incidents, location, time of day.

## QUICK REFERENCE TOOL FOR INVESTIGATIONS

**Procedure:** If an individual or a resident reports suspect abuse or neglect of a resident the nurse in charge is to investigate immediately.

**Step 1.** Take the *Incident Investigation Form- Abuse/Neglect* form and assess the resident. And provide the employee or witness that reported with the *Incident Report for Employee/Witness* to fill out.

**Step 2.** Once the Investigation Forms are filled out call the POA with the findings. If the POA is suspected of the abuse or neglect proceed to Step 1.

**Step 3.** Call the Director of Resident Care/or the Administrator to discuss your finding.

**Step 4.** A decision will then be made if this is a Critical Incident or if the matter will be dealt with internally. If it is a Critical Incident the nurse in charge may need to call the ministry at 1-888-999-6973 or the Director of Resident Care/or the Administrator will complete the Critical Incident Report in house or remotely.

**Step 5.** All the documents regarding this report and investigation will be forwarded to the Administration office to the attention of the Administrator.

**Note Times:**

Time of Report of Abuse or Neglect	
Start Time of Investigation	
Time of Assessment of Resident	
Time POA is called	
Time Director of Resident Care/Administrator is called	
If Ministry is called note the time and name of person is spoke to	





## Incident Investigation Form - Abuse/Neglect

Incident details	
Type of incident:	
Reason for suspicion:	
Date and time of incident:	Location:
Name of resident(s) involved:	
Person alleging abuse/neglect:	
Name of employee investigating (completing this form):	Position:

<b>Step 1 Resident Interview and Physical and Emotional Assessment of Resident</b>	
Interview/Assessment Date and Time:	
Resident's Description of Incident: - document what the resident said in his/her own words in the progress notes and attach progress note to this sheet.	
Physical Assessment	Emotional Assessment
<ul style="list-style-type: none"> <li>o Any new marks, scratches, redness open areas, pain, etc.</li> <li>o Document all findings or lack of findings in progress notes and attach progress note to this sheet</li> <li>o Document facts only- do not speculate</li> </ul>	<ul style="list-style-type: none"> <li>o Mental status - any new or abnormal crying, yelling, quietness, etc.</li> <li>o Does the resident feel safe?</li> <li>o What would the resident like done - if resident cannot answer- what does the POA want done</li> <li>o Document all findings in progress note and attach to this form</li> <li>o Document facts only - do not speculate</li> </ul>
Comments: Reminder - start you progress note with: "Emotional and Physical Assessment" - do not mention the word alleged abuse or alleged neglect. Keep all detail factual - do not speculate.	



# INCIDENT REPORT FOR EMPLOYEES/WITNESS TO FILL OUT

Name of Employee/Witness reporting: .....

Date of incident: ..... Location: .....

Time of incident: ..... Time at report: .....

Signature..... Date: .....

Description	Details
What did you see/hear?	
What did you do?	

Who did you report  
it to?

Position: .....