
COMPLIANCE ORDER SUMMARY TO BE MADE AVAILABLE IN HOME

Pursuant to the *Retirement Homes Act, 2010* S.O. 2010, Chapter 11, section 90.

1000057942 Ontario Limited
o/a Highland Manor Retirement Lodge
110 Belsyde Avenue E.
Fergus, ON N1M 1Z5

COMPLIANCE ORDER NO. 2025-T06234-90-01

Under section 90 of the *Retirement Homes Act, 2010* (the “Act”), if the Deputy Registrar of Retirement Homes Regulatory Authority (the “Deputy Registrar” and “RHRA”, respectively) believes on reasonable grounds that a licensee has contravened a requirement under the Act the Deputy Registrar may serve an order on a licensee ordering it to refrain from doing something, or to do something, for the purpose of ending the contravention and achieving compliance, ensuring that the contravention is not repeated, and that compliance is maintained. The Deputy Registrar issues this Compliance Order (the “Order”) to ensure 1000057942 Ontario Limited (the “Licensee”) operating as Highland Manor Retirement Lodge (the “Home”) comes into compliance and maintains compliance with the Act and Ontario Regulation 166/11 under the Act (the “Regulation”).

The Contraventions and Order listed below are followed by the reasons for this Order, and information on the appeal process.

CONTRAVENTION

The Deputy Registrar has reasonable grounds to believe that the Licensee is not in compliance with the following sections of the Act and Regulation:

- Section 62(6) of the Act – The Licensee did not ensure that the plan of care is based on the assessment of the resident and the needs and preferences of the resident.
- Section 67(1) of the Act – The Licensee did not protect residents of the Home from abuse by anyone.
- Section 23(1)(a-c) of the Regulation – The Licensee did not develop and implement a behaviour management strategy that includes techniques and strategies to prevent and address resident behavior that poses a risk to the resident or others in the Home.
- Section 23(2) of the Regulation – The Licensee did not ensure that all staff who provide care services to residents are advised at the beginning of every shift of each resident whose behaviours require heightened monitoring.

- Section 47(5) of the Regulation - The Licensee shall ensure that an interdisciplinary care conference for dementia care is held as part of the development of the resident's plan of care.

BRIEF SUMMARY OF FACTS

Two residents diagnosed with dementia engaged in repeated verbal and physical altercations, resulting in harm to both residents and staff. The Licensee did not hold interdisciplinary care conferences as required for either resident based on their diagnoses of dementia. Further, the Licensee did not develop or implement effective behaviour management strategies, initiate behaviour monitoring, or ensure that either resident's plan of care was updated as required despite escalating responsive behaviours.

REQUIRED ACTION

Pursuant to section 90 of the Act, the Deputy Registrar orders the Licensee to immediately comply with the following:

1. Within 90 days of the issuance of this Order, ensure that all management and direct care staff participate in a training session, delivered by a third party approved by RHRA, focused on managing resident behaviours that may pose risks to the residents themselves or to others. The training must include guidance on developing, implementing, and monitoring appropriate behaviour management strategies, techniques, and interventions.
2. Within 60 days of the completion of the training outlined in Requirement 1, the Licensee shall conduct an audit of all resident files to confirm that any resident exhibiting behaviours that pose a risk to themselves or others has an appropriate behaviour management strategy in place, and that an interdisciplinary care conference has been held for all residents with a dementia diagnosis.
3. Following the initial audit outlined in Requirement 2, and for a period of eight months thereafter, the Licensee shall conduct a monthly audit to ensure that heightened behavioural monitoring is being carried out appropriately and effectively for behaviour management purposes.
4. The Licensee shall provide documentation to RHRA confirming the completion of the initial audit and shall subsequently submit the results of the monthly internal audits, including the heightened behavioural monitoring tracking sheets, to RHRA Compliance Monitor on a bi-monthly basis for the full eight-month period.

All information demonstrating compliance with the required actions must be submitted by email to RHRA Compliance Monitoring at enforcement@rhra.ca.

To protect Personal Information and Personal Health Information, all information that is submitted must be de-identified. This includes removing or redacting information that may reasonably identify residents (e.g., name, address, contact information, health card or Social Insurance Number).

Issued on December 9, 2025.