



Reporting for the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Financial period

April 1, 2023 to March 31, 2024

Joseph Brant Hospital



Prepared in accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") and in particular section 11

TO: Board of Directors for Joseph Brant Hospital, (the "Board")
FROM: Eric Vandewall
President & Chief Executive Officer
Joseph Brant Hospital
Date: May 31, 2024
REPORTING PERIOD: April 1, 2023, to March 31, 2024

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Date: May 31, 2024
Full Name: Eric Vandewall
Title: President and Chief Executive Officer

Signature: 

I have the authority to bind Joseph Brant Hospital

I certify that this attestation has been approved by the Board of Joseph Brant Hospital on

Date: May 31, 2024
Full Name: Barbara Elliot
Title: Chair, Board of Directors

Signature: 

I have the authority to bind Joseph Brant Hospital

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Executive Summary

Joseph Brant Hospital ("JBH") is a full-service community teaching hospital located in the growing and thriving community of Burlington, Ontario, serving more than 185,000 residents in Halton, Hamilton, Waterdown, Flamborough, Milton and Stoney Creek. JBH is honoured to be recognized as one of Hamilton Niagara's Top Employers for eight consecutive years, with a skilled staff of 194 physicians, 1,911 full and part-time staff and more than 300 volunteers.

JBH is a Clinical Education site in conjunction with McMaster University, and designated as an Academic Community Teaching Hospital. Its expanded campus includes the state-of-the-art Michael Lee-Chin & Family Patient Tower, featuring a new Emergency Department, 295 acute inpatient beds, 9 new Operating Rooms, and post-anaesthetic care unit to support expanded medical, surgical, and outpatient services. JBH is also a partner member of the Burlington Ontario Health Team ("BOHT").

JBH inspires and empowers a culture of caring and this is demonstrated in many ways including our commitment to the health, safety, and wellbeing of our people.

JBH acknowledges and is committed to comply with Bill S-211: Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"). JBH embraces the Act as a necessary step forward to combat forced and child labour and to facilitate and track annual progress. This annual report is JBH's first report under this legislation and is prepared in compliance with section 11 of the Act for the financial reporting year of April 1, 2023 to March 31, 2024. It outlines JBH's work completed in relation to this legislation.

JBH recognizes the continuous work required to help prevent and stop forced and child labour in supply chains. Through annual reporting, JBH commits to ongoing updates to develop adequate policies and provide training programs for staff who will work to ensure JBH's supply chain is free of forced labour and child labour.

Recognizing the complexity and evolving nature of combating forced labour and child labour in supply chains, JBH acknowledges that compliance with the Act necessitates ongoing and iterative processes within the organization. Therefore, JBH commits to regularly update and maintain its policies and procedures and to provide programs for its employees in order to ensure JBH's supply chain is free of forced labour and child labour.

JBH's annual report will be available to the public online for viewing and download at: www.josephbranthospital.ca.

Subsection 11(1) response

Over the course of the previous fiscal year, JBH has leveraged contracts through its Shared Services Organization (“SSO”) Mohawk Medbuy Corporation (“MMC”) for the majority of required supplies, consumables, services and equipment. MMC has updated its Request for Proposal (“RFP”) and contract templates to incorporate appropriate language focused on preventing the risk of forced labour and child labour being used by suppliers or in their supply chains. JBH has updated its own RFP and contract templates with similar language for suppliers that work with JBH directly.

While JBH has not completed a full review of the minority of contracts that fall outside of MMC, JBH is not aware of any instances of forced labour and child labour being used in those contracts. Moreover, MMC and JBH have not been made aware of any instances where forced labour or child labour exist in current supply chains. Should any issues be identified, JBH is committed to investigate accordingly. JBH will continue to work with MMC as they formalize their commitment to sustainability and Environmental, Social and Governance (“ESG”) practices through the creation of a dedicated ESG team to enable a cohesive, sustainable health care supply chain.

Subsection 11(3) response

a) Structure, activities and supply chains

JBH is a leading hospital corporation located in Burlington, Ontario, and is governed by Board of Directors. With a skilled team of 194 physicians, 1,911 full and part-time staff and more than 300 volunteers, JBH services the growing and diverse populations in Burlington, Halton, Hamilton, Waterdown, Flamborough, Milton and Stoney Creek.

JBH is a Clinical Education site in conjunction with McMaster University, and designated as an Academic Community Teaching Hospital. Its expanded campus includes the state-of-the-art Michael Lee-Chin & Family Patient Tower, featuring a new Emergency Department, 295 acute inpatient beds, 9 new Operating Rooms, and post-anaesthetic care unit to support expanded medical, surgical, and outpatient services.

In line with JBH’s Mission (Provide high-quality person-centred care together with our partners), Vision (Relentless pursuit of exemplary care and experiences for all) and Values (Compassion, Accountability, Respect, Excellence), collaboration with suppliers and stakeholders is key to maintaining high standards of quality and patient safety. JBH formed a Diversity, Equity and Inclusion action table in 2020. This action table incorporates JBH’s strategic objectives and uses an anti-oppression approach to supporting a workplace that actively seeks to rectify systemic inequities and upholds our Values, Mission, and Vision.

JBH’s supply chain encompasses a range of activities and processes from the acquisition of medical supplies and equipment to the delivery of patient care. Purchasing entails sourcing and procuring medical supplies, equipment, pharmaceuticals, and other necessary items and services for the hospital.

Key components of JBH's supply chain include procurement and distribution / logistics services. Procurement involves sourcing and purchasing medical supplies, equipment, pharmaceuticals, and other necessary items and services for the hospital. JBH's sourcing and procurement activities, as well as distribution, are primarily managed by MMC. Internal logistics staff ensure timely product delivery to departments and sites across the organization.

b) Policies and due diligence processes

MMC, which facilitates the majority of JBH's contracts, in a letter dated March 13, 2024 to its members⁸, has modified their contract and competitive procurement templates to include language that supports the reduction of forced and child labour. Neither JBH nor MMC have been made aware of any instances where forced labour or child labour exist within our current supply chain.

JBH is committed to our obligations mandated by the government, such as Ontario Human Rights Code² and Employment standards Act³, and are guided by our corporate policies including but not limited to Code of Conduct Policy and Procedure 1-10-200¹, Occupational Health & Safety 1-10-205, Harassment and Discrimination Policy and Procedure 1-10-120, Ethical Practices Policy 050, Environmental Sourcing Policy 026, Non-Discrimination Policy 025, and Identifying and Managing Child Abuse and Neglect Policy and Procedure 1-60-166.

JBH believes in accountability and transparency of information. On a regular basis we post and update all the information relates to areas that include Accountability Agreements, Broader Public Sector Accountability ("BPSA") and Accessibility for Ontarians with Disabilities Act Policies.

JBH does not currently have a dedicated policy on forced labour or child labour in direct relation to our supply chain, however is discussing the topic with its peers with the intent to adopt a policy and procedure in the near future.

c) Forced labour and child labour risks

JBH acknowledges that the risk of forced labour and child labour can exist in a supply chain either directly or indirectly, and recognizes the need for organizations to implement steps to identify and prevent these risks through appropriate supply chain due diligence. JBH has not previously began direct efforts to identify specific areas or activities in the supply chain that may pose such risks, aside from the work already undertaken by MMC. JBH relies on contracts facilitated through MMC who have confirmed their due diligence and compliance with the Act. As of today, JBH and MMC have not been made aware of any instances where forced labour or child labour exists in our current supply chain.

d) **Remediation measures**

JBH has exercised care and due diligence in the supply chain and to date, there are no known instances of forced labour and child labour within our supply chain.

e) **Remediation of loss of income**

JBH has exercised care and due diligence in the supply chain and to date, there are no known instances of forced labour and child labour within our supply chain.

f) **Training**

JBH has been working with other hospitals, MMC, and the Ontario Hospital Association (“OHA”) to share ideas on how to develop training material regarding the Act. JBH staff have participated in webinar sessions offered by the OHA, MMC and legal counsel related to the Act.

As of now, JBH has not conducted comprehensive training for its employees on the topic of forced labour and child labor. However, JBH has begun to create awareness in some team huddles and intends to find ways to support additional staff in the near future with education and training on the Act.

MMC is currently developing and implementing applicable training for the MMC sourcing teams, and as part of that process is exploring if or how that could be shared with JBH. MMC has committed to creating a dedicated ESG team which will include training and implementation support and JBH is interested to be an active participant in these activities.

g) **Assessing effectiveness**

JBH understands the process of fighting against forced labour and child labour in supply chains is complex and evolving. Hence, the adoption of the Act requires ongoing and iterative processes to be incorporated into our organization. No previous actions have been taken to assess their effectiveness in preventing and reducing risks of forced labour and child labour in their activities and supply chains. However JBH will continue to work closely with other entities such as OHA and MMC as respective policies and trainings for employees are developed.

References:

1. JBH Code of Conduct Policy and Procedure 1-10-200
2. Ontario Human Rights Code, Ontario Human Rights Commission, website: [The Ontario Human Rights Code | Ontario Human Rights Commission \(ohrc.on.ca\)](https://www.ohrc.on.ca/)
3. Employment Standards Act, 2000 (ESA), Government of Ontario, Employment Standards Act, 2000, S.O. 2000, c. 41, website: [Employment Standards Act, 2000](https://www.ontario.ca/gov/service/employment-standards-act-2000).



S.O. 2000, c. 41 (ontario.ca)

4. Proponent Confirmation Form – JBH RFP Template
5. Representations, Warranties, Covenants – JBH Master Agreement Template
6. Navigating Compliance with Bill S-211 OHA/BLG Member Webinar – March 2024
7. MMC Member Bill S-211 Communication – dated January 10, 2024
8. MMC Reporting for the Fighting Against Forced Labour and Child Labour in Supply Chains Act letter – dated March 13, 2024