



Winnipeg Regional
Health Authority

Office régional de la
santé de Winnipeg

**WINNIPEG REGIONAL HEALTH AUTHORITY
ANNUAL REPORT FOR APRIL 1, 2023 – MARCH 31, 2024
FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT**

Introduction

This annual report is in response to the requirement under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), that an “Entity” report on its activities to mitigate the risk of forced labour and child labour being employed within its supply chain and its activities.

As it was confirmed that the Act pertains to Winnipeg Regional Health Authority (“WRHA”) as an “Entity”, this annual report is the first WRHA has completed pursuant to the Act.

Steps Taken in Previous Financial Year (April 1, 2023 – March 31, 2024)

The Winnipeg Regional Health Authority (“WRHA”) did not take any steps during the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of its production of goods in Canada or elsewhere by WRHA or of goods imported into Canada by WRHA. Therefore, WRHA has no information to provide on such steps for this reporting period.

Structure

The Winnipeg Regional Health Authority (“WRHA”) is a health authority and continued as a corporation under *The Health System Governance and Accountability Act* (Manitoba). The WRHA is responsible for the provision of health care services to the residents of the City of Winnipeg, as well as the northern community of Churchill and the rural municipalities of East and West St. Paul. The WRHA also provides health-care support and specialty referral services to Manitobans who live beyond these boundaries, as well as residents of northwestern Ontario and Nunavut, who often require the services and expertise available within the WRHA.

The WRHA operates or funds over 200 health service facilities and programs, including regional laundry services, regional food distribution services, community health agencies, grant-funded agencies, acute hospitals, community hospitals, health centres, personal care homes, supportive housing providers, ACCESS centres and Walk-In Connected Care Clinics.

Winnipeg Regional Health Authority Activities

The Winnipeg Regional Health Authority (“WRHA”) has determined it is engaged in the production, sale, importing, and distribution of goods as follows:

1. Food services:
 - a. The WRHA operates a food/beverage franchises at a number of facility locations where food/beverages are assembled by its staff and sold to the public.
 - b. The WRHA’s Regional Distribution Facility provides prepared meals to all WRHA-operated facilities and select devolved operations which are then distributed to patients and residents through an onsite meal service at each site.
2. Pharmacy compounding of medications:
 - a. The WRHA, through its Pharmacy Program staff, compounds medications that are not sold, but used for patient care in Manitoba sites where clinical care is delivered.
3. Importing:
 - a. The WRHA relies on its Shared Health partner to support WRHA clinical service delivery. Shared Health may purchase goods produced outside Canada from third party suppliers, where that third party is considered to be the importer for the purposes of the *Customs Act* but understands such is not considered importing under the Act.
 - b. However, Shared Health on as needed basis imports goods from distributors, with the assistance of a customs broker as needed, if its existing suppliers cannot provide the goods. This importing mostly applies to medical supplies and generally such is imported from the United States.

Supply Chain Underlying Winnipeg Regional Health Authority Activities

Supply Chain Management Shared Services (“SCMSS”) is a shared administrative service under Shared Health. Shared Health provides fully centralized supply chain services to all sites operated by the Winnipeg Regional Health Authority (“WRHA”) and is responsible to lead the competitive bids processes and/or establishing contracts with

suppliers for Shared Health itself (for its operations in Winnipeg and elsewhere in Manitoba), the Winnipeg Regional Health Authority (“WRHA”), and certain health corporations that operate hospitals in Winnipeg. Generally, these purchases are made from contracts established by SCMSS with these suppliers, however, there may be some exceptions.

Shared Health is an active member of HealthPRO which is a national group purchasing organization. Approximately 30% of Shared Health’s goods and equipment contracts are committed to HealthPRO agreements and approximately 95% of Shared Health’s pharmacy contracts are committed through HealthPRO agreements.

SCMSS’ responsibility for WRHA’s activities are as follows:

1. For food/beverage franchises operated within the WRHA, the WRHA relies on the franchisor to source, supply, and deliver the raw materials that are used to produce the food/beverages that are sold at WRHA facilities as the franchisee. SCMSS does not assist the franchisor with those efforts. A description of the direct and indirect suppliers that contribute goods/services to the goods produced and sold through WRHA’s food/beverage franchise at WRHA facilities, and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.
2. The WRHA’s Regional Distribution Facility produces and distributes pre-prepared meals to WRHA’s operated sites and select devolved operations, who in turn heat and distribute these meals to patients and residents. SCMSS is responsible to lead the competitive bid processes and/or contracting with suppliers to supply and deliver the raw materials used by the WRHA’s Regional Distribution Facility to produce the pre-prepared meals. A description of the direct and indirect suppliers that contribute goods/services to the goods produced and distributed through WRHA’s onsite meal service and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.
3. SCMSS infrequently is responsible to lead the competitive bid processes and/or contracting with suppliers for the raw materials used to produce medications that are not sold but used for patient care. For a majority of its Pharmacy Program needs, the WRHA relies on HealthPRO to issue competitive bid processes for these raw materials and thereafter WRHA together with SCMSS enter a contract with the selected suppliers that are managed by HealthPRO. As described above, approximately 95% of WRHA’s pharmacy contracts are committed through HealthPRO. A description of the direct and indirect suppliers that contribute goods/services to the goods produced through Shared Health’s Pharmacy Program and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.

4. SCMSS, with the assistance of a customs broker, on an as needed basis imports goods for the WRHA from a distributor if existing suppliers cannot provide them. This importing mostly applies to medical supplies and generally such are imported from the United States. A description of the direct and indirect suppliers that contribute goods/services to the goods imported by Shared Health, on behalf of the WRHA, and a more detailed description of the source countries/regions of those goods/services, was not able to be ascertained for this annual report.

Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

The Winnipeg Regional Health Authority (“WRHA”) currently does not have any policies or due diligence processes (as described in the *OECD Due Diligence Guidance for Responsible Business Conduct*) in place related to forced labour or child labour. However, the WRHA has hiring procedures that are designed to maintain compliance with federal immigration legislation and provincial employment legislation which addresses one form of child labour as defined in the Act i.e., *labour or services provided or offered to be provided by persons under the age of 18 years and that are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada.*

WRHA’s hiring procedures are designed to maintain compliance with federal immigration legislation that requires permanent residency, citizenship, or a permit to work in Canada or the pending application for the same, and provincial legislation where the WRHA must register to employ any foreign worker other than a Manitoba Provincial Nominee.

All prospective employees of the WRHA, including staff recruited for food and pharmacy services, are recruited by advertising job opportunities on various career websites as well as the WRHA/Shared Health career website. Prospective employees are required to respond to the question “*Are you legally authorized to work in Canada?*” and the answer options are: “*a) authorized to work for any employer, b) authorized to work for my present employer only, c) I require sponsorship to work in this country*”. As part of the internal controls of the WRHA, applicants are required to accept an acknowledgement that states:

I understand that I am applying for employment within a site or service represented on the Winnipeg Regional Health Authority WRHA/Shared Health careers website. All information I provide as part of the application process is true and correct, and not misleading in any way. I understand that elements of my application may be checked, including references from prior employers, job history, education, and other qualifications and information provided by me. If it is found that I have misrepresented myself, my application may be disqualified; if I have been awarded a position, my employment may be terminated, regardless of how much time has elapsed. If I am offered employment, I will be required to supply satisfactory background checks as described in the written employment contract.

As a general practice the WRHA does not employ people under the age of 18 years. However, the WRHA cannot prohibit employing persons that are under the age of 18 years as that would be considered age discrimination. Shared Health has hiring procedures that are designed to maintain compliance with *The Employment Standards Code* (Manitoba) which non-exhaustively requires:

1. To not employ a person under the age of 13 years.
2. To employ a person that is 13 years or older but less than 16 years old requires a Work Readiness Certificate and/or a Child Employment Permit. The Work Readiness Certificate would certify they completed the Young Worker Readiness Certificate Program which pertains to labour rights and safety and include a signed consent of their parent to the employment.
3. To not employ a person under the age of 16 years between 11:00pm and 6:00am or for more than 20 hours during a week of school.

As per Section 4.1 of [Winnipeg Regional Health Authority Policy #20.30.040 \(Security Checks for Employment\)](#), all new hires are required to complete a criminal records check (including vulnerable sector search), adult abuse registry check, and child abuse registry check (“Security Checks”). In WRHA’s screening processes, the age of a worker (and the corresponding obligations/restrictions for employing same under *The Employment Standards Code* (Manitoba)) would be identified when reviewing the [Security Checks. Section 4.4 of Winnipeg Regional Health Authority Policy #20.30.040 \(Security Checks for Employment\)](#), provides if an applicant must commence employment before the Security Checks are obtained and provided to the WRHA, the letter of offer to the applicant will contain a statement that the offer of employment is conditional on the return of satisfactory security check(s), as required, and the failure to return same on or before the date specified could result in the immediate termination of employment for cause.

Forced Labour and Child Labour Risks

The Winnipeg Regional Health Authority did not start the process of identifying parts of its activities and supply chains that carry a risk of forced labour or child labour being used in the previous financial year.

Remediation Measures/Remediation of Loss of Income

The Winnipeg Regional Health Authority (“WRHA”) did not undertake any measures to remediate any forced labour or child labour in its activities and supply chains in the previous financial year.

In addition, WRHA has not taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.

Training on Forced Labour and Child Labour

The Winnipeg Regional Health Authority does not currently provide training to employees on forced labour and/or child labour.

Policies and Procedures Assessing Effectiveness

The Winnipeg Regional Health Authority has no policy or procedure in place at this time to assess its effectiveness in ensuring forced labour and child labour are or are not being used in its activities and supply chains.

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.

Name:

Title:

Date:



Mike Nader,
President and CEO
Winnipeg Regional Health Authority

I have the authority to bind The Winnipeg Regional Health Authority ("WRHA")



Dan Skwarchuk,
Regional Lead Corporate and CFO
Winnipeg Regional Health Authority

I have the authority to bind The Winnipeg Regional Health Authority ("WRHA")