



PROCUREMENT & STRATEGIC SOURCING

**Entity Report - Bill S-211 an Act to Enact the
Fighting Against Forced Labour and Child
Labour in Supply Chains Act**

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Prepared by

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Prelude

Bill S-211 an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) imposes obligation on certain government institutions and private-sector entities to report on measures taken to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains.

This enactment also amends the Customs Tariff to allow for a prohibition on the importation of goods manufactured or produced, in whole or in part, by forced labour or child labour as those terms are defined in the Act.

This report outlines steps taken by St. Joseph’s Care Group (SJCG) to demonstrate compliance with the Act.

About St. Joseph’s Care Group

SJCG combines tradition and innovation in responding to the unmet needs of the people of Northwestern Ontario, offering a broad range of programs and services in Addictions & Mental Health, Rehabilitative Care, and Seniors’ Health across eight sites in the City of Thunder Bay.

With over 2,200 staff, we pride ourselves on maintaining our core values of Care, Compassion, and Commitment. We are recognized as a leader in delivering safe, high-quality health care and have been accredited with Exemplary Standing, the highest level awarded by Accreditation Canada.

Our vast service area and culturally diverse client population includes many remote and isolated communities where access to specialized health services proves to be a challenge. To meet this need, SJCG discovers and implements new ways to deliver care through strong partnerships and innovative technologies, and we remain Northwestern Ontario’s regional lead for Rehabilitative Care, Behavioural Supports, Seniors’ Care, Rapid Access Addiction Medicine, and Palliative Care.

Response to Reporting Requirements Under the Act

SJCG Structure & Supply Chain Activities

SJCG is a non-profit health care provider operating as a limited corporation in the Province of Ontario, governed by its Board of Directors, under Business Number 108025859. SJCG falls within the prescribed definition of a reporting Entity under the Act.

In support of the services provided by SJCG, SJCG purchases a broad array of goods, services and construction, including the importation of goods & services. These purchased goods and services include

but are not limited to: professional services, medical equipment and medical supplies, facility operation and maintenance services, office supplies, textiles and food products.

Policies and Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

SJCG is committed to ensuring that there is no forced labour and child labour in our supply chains or in any part of our business, and commits to putting in place the necessary processes, controls, partnerships and auditing processes to ensure same. The principals and spirit of the Act align with the business culture of our organization, which includes our Supply Chain Code of Ethics:

Supply Chain Code of Ethics

Personal Integrity and Professionalism: All individuals involved with purchasing or other supply chain-related activities must act, and be seen to act, with integrity and professionalism. Honesty, care and due diligence must be integral to all supply chain activities within the SJCG and between Broader Public Sector organizations, suppliers and other stakeholders. Respect must be demonstrated for each other and for the environment. Confidential information must be safeguarded. All participants must not engage in any activity that may create, or appear to create, a conflict of interest, such as accepting gifts or favours, providing preferential treatment, or publicly endorsing suppliers or products.

Accountability and Transparency: Supply chain activities must be open and accountable. In particular, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money. All participants must ensure that public sector resources are used in a responsible, efficient and effective manner.

Compliance and Continuous Improvement: All individuals involved in purchasing or other supply chain-related activities must comply with this Code of Ethics and the laws of Canada and Ontario. All individuals should continuously work to improve supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices.

As a designated Broader Public Sector Organization under the Broader Public Sector Accountability Act (Ontario) 2010, procurement practices are governed by SJCG policies, the Broader Public Sector Procurement Directive (2024), along with domestic and internal trade treaties (Agreements).

Procurement Activities and Partnerships

SJCG's supply chain activities are part of a complex and comprehensive framework that includes multiple stakeholders that facilitate procurement processes for ourselves and other public organizations. These stakeholders include peer health care organizations, group purchasing organizations, governments, shared services organizations and supplier associations.

As an organization SJCG believes the greatest progress in the fight against forced labour and child labour will be realized by focusing effort toward procurements completed at the provincial and national level. These procurements are normally advanced on behalf of multiple organizations, involve higher spend, and engage higher risk purchasing categories. We believe that working in this collaborative approach

will yield optimal results as it provides: a standardized approach and actions taken, and a single point to review compliance with requirements under the Act. Discussions are underway with these stakeholders & partners to identify roles, responsibilities and processes to achieve the mandate of eliminating forced labour and child labour from procurement.

Local Procurement Activities:

As an organization, SJCG is reviewing procurement policies and processes to ensure alignment with the Act. Examples of recent changes include adding language to procurement documents to highlight forced labour and child labour prohibitions and requiring suppliers to confirm they comply with this condition. Additionally, policies are being amended to incorporate a supplier code of conduct that will incorporate the requirements of the Act.

Training for Employees Regarding Forced Labour and Child Labour

Targeted training regarding the Act is planned for the upcoming year. The training will identify forced labour issues and provide guidance to support escalation and resolution issues of non-compliance with the Act. Training will be aimed at those deemed to be at greatest risk of encountering issues covered by the Act. In addition to staff in the purchasing function, training will be made available to individuals that have a decision-making role in the procurement of goods and services (e.g. Product Evaluation Committee). Training will be delivered in partnership with our supply chain partners and supplemented with internal training resources.

Material covered through training will include:

- Clarity regarding our obligations under the Act;
- Tools to identify forced labour and child labour in procurement processes;
- Guidance on crafting effective procurement documents and processes that prevent contracting with suppliers involved in forced labour and child labor; and
- Resources to support individuals to manage and escalate issues where incidents of forced or child labour are discovered.

Plans for the Upcoming Year

Over the next year, SJCG plans to further embed processes to identify and eliminate forced labour and child labour from our supply chain. Activities planned for the upcoming year include:

- Improving our understanding of global supply chains and the risk profile of suppliers in high risk sectors;
- Enhancing our supplier vetting and qualification processes;
- Introducing a risk-based approach by adding “forced labour and child labour” to our existing risk matrix and risk register in onboarding suppliers;
- Continuing engagement with our partners through workshops, webinars and other events to increase awareness of “forced labour and child labour” risks;
- Continuing analysis of procurement categories to identify high risk areas and implement more robust control processes to reduce risk in these areas; and
- Initiating audit processes for suppliers whose own supply chains may be more at risk of “forced labour and child labour” activities.

Commitment to Engaging with Authorities Regarding the Act:

SJCG will continue to collaborate with the following authorities regarding the Act.

- **Provincial public sector authorities:** SJCG will engage Provincial authorities that issue directives and procurement tools that support the Act.
- **Federal agencies:** Having jurisdiction over the Act, SJCG acknowledges the federal government oversees enforcement agencies that play a critical role in enforcement of the Act (i.e. Canada Border Services Agency).
- **National and international monitoring / reporting agencies:** SJCG will engage procurement sector associations that play a critical role in the education and training of our procurement professional.

SJCG will work with those stakeholders and partners that conduct procurement activities on our behalf to ensure that they have in place the appropriate policies, processes, tools and systems to conduct the procurement processes in compliance with the Act, including an annual attestation validating same.

ATTESTATION

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 or entities 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.

Full name: Susan Fraser

Title: Chair, St. Joseph's Care Group

Date: April 17, 2024

Signature: 

I have the authority to bind St. Joseph's Care Group