

# Fighting Against Forced Labour and Child Labour in Supply Chains Act

## Preamble

The Queensway Carleton Hospital (the “Hospital”) takes seriously its responsibility as a larger organization with a significant supply chains. It speaks to the hospital’s core values: Collaboration, Accountability, Innovation and Respect. The Hospital continuously works hard to ensure it achieves the best value for the use of public funds, while mitigating the risk of shortages, and ensuring the ethical sourcing of goods and materials. The Hospital is committed to fair, competitive and transparent procurement practices.

The Queensway Carleton Hospital has created a report to outline the measures it has taken to address forced labour and child labour in its supply chains. This report is for the Hospital’s previous financial year which ended March 31, 2024, and has been uploaded onto the Public Safety Canada’s website. The Hospital will continue to work with its supply chain partners to fight against forced labour and child labour, as well as build socially responsible procurement practices and policies.

*<The remainder of this page remains blank>*

# Fighting Against Forced Labour and Child Labour in Supply Chains Act

## Introduction

Queensway Carleton Hospital (the “Hospital”) has determined itself to be a Reporting Entity as outlined in Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). The Hospital is classified as an entity because the organization meets the following criteria:

- Canadian business presence
  - Has a place of business in Canada;
  - Does business in Canada; and
  - Has assets in Canada.
- Size-related threshold
  - Has at least \$20 million in assets for at least one of its two most recent financial years;
  - Has generated at least \$40 million in revenue for at least one of its two most recent financial years; and
  - Employs an average of at least 250 employees for at least one of its two most recent financial years.

The Hospital is classified as a Reporting Entity because it meets the following criteria:

- Sells goods in Canada; and
- Imports goods into Canada that are produced outside of Canada.

Queensway Carleton Hospital is a corporation that conducts its business in Ottawa, Ontario, Canada, is in the healthcare and social assistance industry, and its business number is 107868770 RT0001. The Hospital is completing this Report for only itself, and is not representing any other Entity.

This report will be covering the fiscal year of 2023-2024 (April 1, 2023 to March 31, 2024). It will only include measures and steps taken by the organization during this timeframe. This is the first and final version of this Report.

## Organizational Background *(its structure, activities, and supply chains)*

Queensway Carleton Hospital is a provincially funded, not-for-profit organization located in the City of Ottawa. The Hospital is a registered charity under the Income Tax Act. The Hospital is a patient and family-centered, urban community hospital where the patient and their family come first.

The Hospital’s dedicated employees serve a community that is ever-changing and a population that is ever-growing. With a catchment area of more than 500,000 residents, the Hospital is currently undergoing expansions and renovations to ensure it is able to meet the needs of the community.



**Queensway Carleton  
Hospital**

Queensway Carleton Hospital is committed to providing high quality patient care through each of its cornerstone programs, designed to meet the health care needs of the people that live, work, and play in the region. Employing over 2,700 health care professionals with an operating budget of over \$275 million, this 355-bed facility is also the secondary referral centre for the Ottawa Valley, providing primary and secondary services in a variety of inpatient and outpatient settings. The Hospital's cornerstone programs include Emergency, Medicine, Surgery, Critical Care, Childbirth, Mental Health, Acute Rehabilitation, and Geriatric Care.

Queensway Carleton Hospital must adhere to the Ontario Broader Public Sector Procurement Directives, The Canadian Free Trade Agreement, the Canadian Economic Trade Agreement, and the Canada-US-Mexico Agreement. The Hospital procures goods, and services independently as well as through Group Purchasing Organizations (GPO) and Shared Services Organizations (SSO).

**Prevention Efforts** *(the steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods produced, purchased, or distributed by the government institution)*

Since the implementation of the Act, Queensway Carleton Hospital has required its suppliers to attest to adhering to the Act when submitting bids to its publicly posted tenders, such as RFP, RFT, RFS, RFQ, etc. All Group Purchasing Organizations (GPOs) and Shared Service Organizations (SSOs) of which the Hospital affiliates, are also complying with the Act's requirements for their sourcing and procurement activities.

The hospital has been reviewing supply chain ethics commitments made by suppliers, to ensure their supply chains are free of forced labour and child labour. This review will continue into the next fiscal year and thereafter to ensure that the hospital's suppliers meet their requirements with respect to forced labour and child labour.

For the 2024/2025 fiscal year, the hospital will create stricter agreement clauses outlining the necessity of the Act and require reporting from suppliers on the steps they are taking to ensure their supply chains are free of forced labour and child labour.

**Policies and Due Diligences** *(its policies and due diligence processes in relation to forced labour and child labour)*

As of the end of the 2023-2024 fiscal year, Queensway Carleton Hospital did not have any policies or due diligences relating to forced labour and child labour.

Policies and due diligences will be put in place for the upcoming 2024/2025 fiscal year. The Hospital plans to update its procurement policy and require all publicly posted tenders to stipulate that suppliers must report on their forced labour and child labour policies, and articulate if their supply chains are at risk of propagating forced labour or child labour.



**Risk Assessment** *(the parts of its activities and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk)*

Queensway Carleton Hospital has started the process of identifying risks, but this work is still on-going. To date, no gaps or specific risks have yet been identified. The Hospital will continue to work on identifying the risks of forced labour and child labour in supply chains, and determine the best way to manage and mitigate those risks.

As the Hospital operates in Ontario, there are no risks of forced or child labour within the organization, however there are risks of forced labour and child labour with the suppliers that partner with the Hospital. The Hospital will attempt to identify suppliers that have risks of forced labour and child labour and will eliminate future use of their products or services while being cognizant of any economic hardship that could ensue.

**Remediation Action** *(any measures taken to remediate any forced labour or child labour)*

Queensway Carleton Hospital has not identified any supplier that has the risk of forced labour or child labour. Due to the lack of findings, the Hospital has not taken any remediation actions to eliminate forced labour or child labour within its organization. The Hospital will stay vigilant and continuously monitor for any forced labour and child labour within its supply chain partnerships.

**Mitigating Income Loss** *(any measures taken 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)*

Queensway Carleton Hospital has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our supply chain activities. The Hospital will continue to diligently review and assess the potential of income loss, and ensure our supply chain partners are taking immediate action to remediate the situation.

**Employee Training** *(the training provided to employees on forced labour and child labour)*

Queensway Carleton Hospital has provided mandatory training for its procurement department employees. Each employee is knowledgeable about the Act and its requirements. The employees are aware of the supplier attestation within the organization's tendering documents, and understand the importance of removing forced labour and child labour from supply chains.

Information sessions about the Act and the Hospital's obligations under the Act will be provided to the Hospital's management team. These information sessions will occur in fiscal 2024/2025.



**Queensway Carleton  
Hospital**

**Effectiveness Evaluation** *(how the government institution assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains)*

Queensway Carleton Hospital does not currently have policies in place to assess the effectiveness of its efforts to ensure forced labour and child labour are not being used in its supply chain activities. Policies and procedures to assess the effectiveness of our actions will be reviewed and implemented in fiscal 2024/2025. The Hospital will monitor and engage with its supply chain partners to understand the impact our actions are having on the reduction of forced labour and child labour in our supply chains.

**Documentation**

The Hospital keeps thorough and proper records to support the claims made throughout this Report.

**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.

Handwritten signature of Atul Aggarwal in black ink.

Date:

Handwritten date "April 24, 2024" in black ink.

Atul Aggarwal  
Board Chair

I have the authority to bind the Queensway Carleton Hospital.