



Thank you for submitting your annual report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Below is a summary of your responses

[Download PDF](#)

Forced labour in Canadian supply chains: submit a questionnaire

Data Management Disclaimer

Entities and government institutions must complete this questionnaire if they have reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act). If an entity or government institution is unsure whether they are required to report, refer to guidance on [how to prepare a report](#).

Entities must have their completed report approved by the appropriate governing body or bodies.

Completing this questionnaire, including attaching the PDF version of the entity's or government institution's report, is mandatory. The questionnaire is considered complete if all of the mandatory fields have been filled out and a report has been uploaded that meets all of the following requirements:

- Contains information addressing each of the legal requirements in subsections 6(1) and 6(2), for government institutions, or in subsections 11(1) and 11(3), for entities;
- For entities, has received the necessary approvals and includes the signed attestation;
- Does not exceed 10 pages in length, or 20 pages for reports provided in both Canadian official languages; and
- Is a PDF file that does not exceed 100MB in size.

For more information, please refer to the [guidance](#).

Failure to complete the questionnaire is considered an offence under subsection 19(1). All offences under subsections 19(1) and 19(2) are punishable on summary conviction and a fine of

not more than \$250,000. The questionnaire must be completed using information from activities undertaken during the entity's or government institution's previous financial year before the reporting deadline of May 31, 2024.

There is no prescribed level of detail required for the responses. Entities and government institutions should use discretion in determining the appropriate level of detail proportionate to the size and risk profile of the entity or government institution.

Knowingly making a false or misleading statement or providing false or misleading information in the questionnaire responses or in the report is considered an offence under subsection 19(2).

Questionnaire responses will be stored by Public Safety Canada and will be disposed of in accordance with the Policy on Service and Digital, the *Access to Information Act*, the *Privacy Act* and the *Library and Archives Act*. The report itself will be added to the Public Safety Library's collection and will be subject to the Public Safety Canada Library Collection Development Policy. Public Safety Canada may proceed with the manipulation or translation of answers to align the bibliographical data of the report to Treasury Board Secretariat Standard on Metadata and Public Safety Canada Library cataloguing and description procedures.

Entities and government institutions are also required to publish their report in a prominent place on their website, in accordance with section 8, for government institutions, and subsection 13(1), for entities. Learn more on [how to prepare a report](#)

An entity's failure to publish a report in a prominent place on its website is considered an offence under subsection 19(1).

Entities must complete the questionnaire and submit their report in one of the two Canadian official languages. It is recommended, however, that reports be submitted in both English and French, in order to make reports accessible to the broader Canadian public. Requests for translated copies of reports may be directed to the responsible entity.

Government institutions may complete the questionnaire in either official language, but are required to submit the PDF version of their report in both English and French, as per the *Official Languages Act*.

Privacy Notice Statement

Personal information is collected by Qualtrics on behalf of Public Safety Canada for the purpose of verifying information contained in reports submitted under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act).

Participation in this questionnaire is mandatory for entities and government institutions that are required to report under the Act. Please note that information entered in any open text box field

required to report under the Act. Please note that information entered in any open text box field could be deemed identifiable depending on the information provided. In order to protect privacy, entities and government institutions must not add personal information of any kind in these open text areas.

Personal information will be managed and administered in accordance with the *Access to Information Act*, the *Privacy Act* and any other applicable laws. Public Safety Canada may use the personal information provided in the questionnaire responses for policy development purposes, but the information may also be used for investigative purposes.

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You have the right to the protection of, access to and correction of your personal information. Find instructions for obtaining information through [Public Safety Canada Access to Information and Privacy \(ATIP\)](#).

Any questions, comments, concerns or complaints you may have regarding Public Safety Canada's handling of your personal information may be directed to our Access to Information and Privacy Coordinator by emailing atip-aiprp@ps-sp.gc.ca. If you are not satisfied with Public Safety Canada's response to your privacy concern, you have the right to file a complaint with the [Privacy Commissioner of Canada](#) regarding the institution's handling of your personal information.

**I have read and understand the information above.*



Identifying Information

Please note that information entered in any open text box field could be deemed identifiable depending on the information provided. In order to protect privacy, entities and government institutions must not add personal information of any kind in these open text areas.

***This report is for which of the following?**

Entity



Government institution



***Legal name of reporting entity or government institution:**

Brant Community Healthcare System

Characters remaining: 967

***Financial reporting year (Start Date):**

Month

April

Day

1

Year

2023

***Financial reporting year (End Date):**

Month

March

Day

31

Year

2024

***Is this a revised version of a report already submitted this reporting year?**

Note: If yes, the previous version will be deleted and users will be unable to recover the previously submitted version.

Yes

No

Business number(s) (if applicable):

118817014RR0001

Characters remaining: 985

***Is this a joint report?**

Yes

No

***Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?**

Yes

No



***Which of the following categorizations applies to the entity? Select all that apply.**

Listed on a stock exchange in
Canada



Canadian business presence (select all that apply):

Has a place of business in
Canada



Does business in
Canada



Has assets in
Canada



Meets size-related thresholds (select all that apply):

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



Employs an average of at least 250 employees for at least one of its two most recent
financial years



***Which of the following sectors or industries does the entity operate in?
Select all that apply.**

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing

Wholesale trade

Retail trade

Transportation and warehousing

Information and cultural industries

Finance and insurance

Real estate and rental and leasing

Professional, scientific and technical services

Management of companies and enterprises

Administrative and support, waste management and remediation services

Educational

services

Health care and social assistance

Arts, entertainment and recreation

Accommodation and food services

Other services (except public administration)

Public administration

Other, please specify:

***In which country is the entity headquartered or principally located?**

Canada

***In which province or territory is the entity is headquartered or principally located?**

Ontario

Annual Report

***What steps has the entity taken in the 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 in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply.**

Mapping activities

Mapping supply chains

Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

Developing and implementing an action plan for addressing forced labour and/or child labour

Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily

Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour

Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains

Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour

Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains

Developing and implementing child protection policies and processes

Developing and implementing anti-forced labour and/or -child labour contractual

Developing and implementing anti-forced labour and/or -child labour contractual clauses

Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists

Auditing suppliers

Monitoring suppliers

Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour

Developing and implementing grievance mechanisms

Developing and implementing training and awareness materials on forced labour and/or child labour

Developing and implementing procedures to track performance in addressing forced labour and/or child labour

Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour

Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks

Information not available for this reporting period

Other, please specify:

In the fiscal year ended March 31, 2024, Brant Community Healthcare System took the following steps identified by Public Safety Canada to prevent and reduce the risk that forced labour or child labour is used at any step in its business or supply chains: (1) investigating international purchases, and (2) determining organizational risk and supply chain channels

Please provide additional information describing the steps taken (if applicable) (1500 character limit).

For the fiscal year ended Marcy 31, 2024, Brant Community Healthcare System investigated imports and purchases within the organization. Our view is that supply chain exposure is limited, as most of our supply purchases are governed by two group purchasing offices (Mohawk Medbuy Corporation and Compass Canada). Brant Community Healthcare System has written confirmation that both suppliers take various steps to combat the risk of forced labour and child labour in their supply chains. Outside of these purchasing offices, additional purchasing agreements are also leveraged with other group purchasing offices. The bulk of these purchases are made through US distributors.

Characters remaining: 824

***Which of the following accurately describes the entity's structure?**

Corporation	<input checked="" type="checkbox"/>
Trust	<input type="checkbox"/>
Partnership	<input type="checkbox"/>
Other unincorporated organization	<input type="checkbox"/>

***Which of the following accurately describes the entity's activities? Select all that apply.**

Producing goods (including manufacturing, extracting, growing and processing)

Producing goods (including manufacturing, extracting, growing and processing)
in Canada

outside Canada

Selling goods

in Canada

outside Canada

Distributing goods

in Canada

outside Canada

Importing into Canada goods produced outside Canada

Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

***Has the organization identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

Yes, we have started the process of identifying risks, but there are still gaps in our assessments.

No, we have not started the process of identifying risks.

Please provide additional information on the organization’s structure, activities and supply chains (1500 character limit).

Brant Community Healthcare System has internal policies and procedures in place governing employee conduct and procurement matters. Our Procurement Policy and standard operating procedures, as well as our Code of Conduct [require employees, directors, officers, and contractors to apply with applicable laws, rules and regulations, including those with respect to forced labour and child labour. Employees are required to review and sign off on the Code of Conduct annually. Failure to abide by these terms may result in termination of employment or a contractual relationship with Brant Community Healthcare System.] Our prime GPO has taken the following steps to mitigate the risk of forced and child labour in our supply chains: (i) Modified standard contract language “Representation and Warranties” section: “The goods and any services provided by the Supplier under this agreement are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada’s Fighting against Forced Labour and Child Labour in Supply Chains Act). (ii) Modified competitive procurement templates to include language that supplier must attest to: “Warrants that the goods and services that the Proponent is proposing to provide to the Purchaser are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act).

Characters remaining: 42

***Does the organization currently have policies and due diligence processes in place related to forced labour and/or child labour?**

Yes

No

***If yes, which of the following elements of the due diligence process has**

If yes, which of the following elements of the due diligence process has the organization implemented in relation to forced labour and/or child labour? Select all that apply.

Embedding responsible business conduct into policies and management systems	<input checked="" type="checkbox"/>
Identifying and assessing adverse impacts in operations, supply chains and business relationships	<input type="checkbox"/>
Ceasing, preventing or mitigating adverse impacts	<input type="checkbox"/>
Tracking implementation and results	<input type="checkbox"/>
Communicating how impacts are addressed	<input type="checkbox"/>
Providing for or cooperating in remediation when appropriate	<input type="checkbox"/>

Please provide additional information on the organization's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1500 character limit).

As stated above, the majority of our supply purchases are governed by two group purchasing offices ("GPOs"). We have been advised that our prime GPO has taken the following steps to mitigate the risk of forced and child labour in our supply chains: (i) Modified standard contract language "Representation and Warranties" section: "The goods and any services provided by the Supplier under this agreement are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada's Fighting against Forced Labour and Child Labour in Supply Chains Act). (ii) Modified competitive procurement templates to include language that supplier must attest to: "Warrants that the goods and services that the Proponent is proposing to provide to the Purchaser are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act). (iii) If the GPO is made aware of any instances where forced labour or child labour exists in supply chains, they will inform BCHS. (iv) Developing internal policy and training for those in sourcing and supply chain roles. Our second primary GPO has advised us of similar steps it has taken, including: (i) adherence to various internationally recognized human rights standards. (ii) the implementation of various policies

internationally recognized human rights standards; (ii) the implementation of various policies, including a Code of Business Conduct, Code of Ethics, Global Supplier Code of Conduct, etc.

Characters remaining: 12

***Has the organization identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.**

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing

Wholesale trade

Retail trade

Transportation and warehousing

Information and cultural industries

Finance and insurance

Real estate and rental and leasing

Professional, scientific and technical services

Management of companies and enterprises

Administrative and support, waste management and remediation services

Educational services

Health care and social assistance

Arts, entertainment and recreation

Accommodation and food services

Other services (except public administration)

Public administration

None of the above

Other, please specify:

Please provide additional information on the parts of the organization's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the organization has taken to assess and manage that risk (if applicable) (1500 character limit)

assess and manage that risk (if applicable) (1500 character limit)

Not applicable

Characters remaining: 1486

***Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

No, we have not taken any remediation measures.

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

Please provide additional information on any measures the organization has taken to remediate any forced labour or child labour (if applicable) (1500 character limit).

Not applicable. We have 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 activities and supply chains.

Characters remaining: 1299

***Has the organization 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**

eliminate the use of forced labour or child labour in its activities and supply chains?

Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

No, we have not taken any remediation measures.

Not applicable, we have 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 activities and supply chains.

Please provide additional information on any measures the organization has 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 (if applicable) (1500 character limit).

***Does the organization currently provide training to employees on forced labour and/or child labour?**

Yes

No

Please provide additional information on the training the organization provides to employees on forced labour and child labour (if applicable) (1500 character limit).

***Does the organization currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?**

Yes

No

***If yes, what method does the organization use to assess its effectiveness?
Select all that apply.**

Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour

Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses

Partnering with an external organization to conduct an independent review or audit of the organization's actions

Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators

Other, please specify:

Please provide additional information on how the organization assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable) (1500 character limit).

Our Procurement Policy and standard operating procedures are under review at the time of preparing this report.

Characters remaining: 1389

***Upload report (Required) (100MB limit):**

Upload your report, including the signed attestation, in PDF format

Bill S-211 Modern Slavery Act Resolution of the BCHS Board of Directors May 28.24.pdf

0.9 MB

application/pdf


Upload report in second Canadian official language (Optional) (100MB limit):

Upload your report, including the signed attestation, in PDF format

Attestation Supply Chains Act Report 2023.24 - signed May 28.24.pdf

2.3 MB

application/pdf

* I confirm that the attached report is approved and attested, as required under subsection 11(4) and subsection 11(5) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act. 

***Please identify the name, title and email address of the person authorized to fill out this questionnaire.**

(Note: Public Safety Canada may use the contact information provided should it require additional details regarding the submission. Info will be used as per the privacy note statement.)

Name:

Joe Belancic

Title:

Director, Procurement and Nutrition Services

Email address:

joseph.belancic@bchsys.org

***Do you wish to submit your responses to this questionnaire? (If you wish to amend your answers, please click the "Previous" button.)**

Yes

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