



SEVEN OAKS GENERAL HOSPITAL

**SEVEN OAKS GENERAL HOSPITAL 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 Seven Oaks General Hospital as an “Entity”, this annual report is the first Seven Oaks General Hospital has completed pursuant to the Act.

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

Seven Oaks General Hospital 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 the production of goods in Canada or elsewhere by Seven Oaks General Hospital or of goods imported into Canada by Seven Oaks General Hospital. Therefore, Seven Oaks General Hospital has no information to provide on such steps for this reporting period.

**Structure**

Seven Oaks General Hospital is a community hospital and provides most general hospital services, with some exceptions, to its local community in northwest Winnipeg, as well as services for residents from other parts of Winnipeg and beyond. Seven Oaks General Hospital is a major provider of Urgent Care services, a hub for Kidney Health services, and has a large commitment to Family Medicine, both in terms of in-patient medical care, but also as a center for the training of medical residents and the home of a community medical clinic.

Seven Oaks General Hospital is continued as a corporation under *The Seven Oaks General Hospital Incorporation Act* (Manitoba) and is a health corporation as defined in *The Health System Governance and Accountability Act* (Manitoba). Seven Oaks General Hospital operates under a service purchase agreement with the Winnipeg Regional Health Authority (the "WRHA") wherein the WRHA agrees to provide funding to Seven Oaks General Hospital for the provision of certain health services.

### **Seven Oaks General Hospital Activities**

has determined it is engaged in the production, importing, and distribution of goods as follows:

1. Food services:
  - a. Seven Oaks General Hospital provides an onsite meal service where its staff heat pre-prepared meals and then distribute them to patients.
2. Compounded medications:
  - a. Seven Oaks General Hospital provides, but does not sell, compounded medications to patients while providing patient care. The WRHA through its Pharmacy Program operates licensed pharmacies in various Manitoba sites, including at Seven Oaks General Hospital, and compounds medications that are not sold but used for patient care at Seven Oaks General Hospital. The compounded medications are dispensed by the WRHA Pharmacy Program to the site staff, including Seven Oaks General Hospital staff, that provide them to patients.
3. Importing:
  - a. Seven Oaks General Hospital relies on Shared Health's Supply Chain Management Shared Service ("SCMSS") to procure goods to support its clinical programs. SCMSS on behalf of Seven Oaks General Hospital purchases 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 Seven Oaks General Hospital understands such is not considered importing under the Act.
  - b. However, SCMSS on behalf of Seven Oaks General Hospital on an as-needed basis imports goods from distributors, with the assistance of a customs broker as needed, if the existing suppliers managed by SCMSS cannot provide the goods. This importing mostly applies to medical supplies and generally such is imported from the United States.

### **Supply Chain Underlying Seven Oaks General Hospital Activities**

Shared Health is designated as the provincial health authority pursuant to *The Health System Governance and Accountability Act* (Manitoba) and is responsible to provide certain shared administrative services to health corporations such as Seven Oaks General Hospital. SCMSS is an example of a shared administrative service under Shared Health and provides fully centralized supply chain services to Seven Oaks General Hospital, leading the competitive bids processes and/or establishing contracts with suppliers.

The WRHA is an active member of HealthPRO which is a national group purchasing organization. Through the WRHA's membership, Seven Oaks General Hospital receives the benefits of HealthPRO competitive bid processes and managed contracts. Approximately 95% of the WRHA's pharmacy contracts are committed through HealthPRO agreements

CancerCare Manitoba ("CCMB") is designated as the cancer authority pursuant to *The Health System Governance and Accountability Act* (Manitoba) and cooperates with others, including the Seven Oaks General Hospital, for the delivery of cancer-related health services.

SCMSS' responsibility for Seven Oaks General Hospital's activities are as follows:

1. For the onsite meal service, Seven Oaks General Hospital relies on the WRHA's Regional Distribution Facility to produce and then distribute the pre-prepared meals to Seven Oaks General Hospital, that Seven Oaks General Hospital then heats and distributes to patients. However, 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 Seven Oaks General Hospital's onsite meal service and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.

2. Seven Oaks General Hospital relies on the WRHA's Pharmacy Program to compound medications that are not sold but used for patient care at the Seven Oaks General Hospital. SCMSS infrequently is responsible to lead the competitive bid processes and/or contracting with suppliers for the raw materials used by the WRHA Pharmacy Program. For a majority of the WRHA Pharmacy Program's needs, the WRHA relies on HealthPRO to issue competitive bid processes for these raw materials and thereafter the WRHA enters a contract with the selected suppliers that are managed by HealthPRO. As described above, approximately 95% of the WRHA's pharmacy contracts are committed through HealthPRO. Furthermore, CCMB acquires cancer medications from suppliers and as required provides such to the WRHA Pharmacy Program for compounding. A description of the direct and indirect suppliers that contribute goods/services to the goods produced through the WRHA Pharmacy Program that are distributed accordingly by Seven Oaks General Hospital and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.
  
3. SCMSS, with the assistance of a customs broker, on an as-needed basis imports goods for Seven Oaks General Hospital from a distributor if Seven Oaks General Hospital's existing suppliers that are managed by SCMSS 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 SCMSS, on behalf of Seven Oaks General Hospital, 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**

Seven Oaks General Hospital 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, Seven Oaks General Hospital 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.*

Seven Oaks General Hospital'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 Seven Oaks General Hospital must register to employ any foreign worker other than a Manitoba Provincial Nominee.

All prospective employees of Seven Oaks General Hospital including staff recruited for food 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 Seven Oaks General Hospital, 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 Seven Oaks General Hospital does not employ people under the age of 18 years. However, Seven Oaks General Hospital cannot prohibit employing persons that are under the age of 18 years as that would be considered age discrimination. Seven Oaks General Hospital 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.

Seven Oaks General Hospital is subject to certain WRHA regional policies as it is funded by the WRHA through a service purchase agreement. 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 Seven Oaks General Hospital'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 in extenuating circumstances and with the express approval of Human Resources an applicant may commence employment before the Security Checks are obtained and provided to Seven Oaks General Hospital, 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).

#### **Forced Labour and Child Labour Risks**

Seven Oaks General Hospital 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**

Seven Oaks General Hospital 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, Seven Oaks General Hospital 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**

Seven Oaks General Hospital does not currently provide training to employees on forced labour and/or child labour.

**Policies and Procedures Assessing Effectiveness**

Seven Oaks General Hospital 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: John S. Zabudney  
Title: Board of Trustees, Chair  
Date: May 30, 2024

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke, positioned above a solid black horizontal line.

I have the authority to bind Seven Oaks General Hospital