



## Procurement & Compliance Services

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**Keyano.ca**



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Keyano College recognizes the importance of Bill S-211, Forced Labour in Canadian Supply Chains. We are awaiting confirmation of our reporting requirements, as there are conflicting interpretations on whether Post Secondary Institutions fall under the reporting obligations.

*Guidance on the application of the Act (Prepare a report – Government institutions (publicsafety.gc.ca))*

*The Act defines **government institution** as having the same meaning in section 3 of the Access to Information Act (AIA):*

- *any department or ministry of state of the Government of Canada, or any body or office, listed in Schedule I, and*
- *any parent Crown corporation, and any wholly-owned subsidiary of such a corporation, within the meaning of section 83 of the Financial Administration Act (FAA).*

*The **head** of the government institution, as per section 3 of the AIA, is defined as:*

- *in the case of a department or ministry of state, the member of the King's Privy Council for Canada who presides over the department or ministry, or*
- *in any other case, either the person designated under subsection 3.2(2) to be the head of the institution for the purposes of this Act or, if no such person is designated, the chief executive officer of the institution, whatever their title.*

*Reporting obligations apply to government institutions engaged in producing, purchasing or distributing goods in Canada or elsewhere.*

*Provincial and municipal governmental institutions are not subject to these reporting requirements. However, some provincial agent Crown corporations may fall under the definition of "entity." It is their responsibility to determine whether they are a reporting entity under the Act. Learn more about reporting requirements for entities.*



Keyano College intends to:

- Add language to the RFx documentation to ensure all vendors are aware and compliant with Bill S-211
- Add language to our new vendor information form to ensure all vendors are aware and compliant with Bill S-211
- Add language to our contracting template to ensure all vendors are aware and compliant with Bill S-211.
- Comply with future reporting requirements.

Sincerely,

DocuSigned by:  
*Hailey Nickerson*  
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