

Fighting Against Forced Labour and Child Labour in Canadian Supply Chains: Louis Riel School Division Annual Report

May 31, 2024

In accordance with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2024, the Louis Riel School Division is required to prepare a report for each financial year setting out the steps taken 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 School Division or of goods imported into Canada by the division.

Protection for individual human rights and commitment to the principles of diversity, equity, inclusion, and accessibility are central to the four strategic priorities outlined in the 2023-2027 Multi-Year Strategic Plan of the Louis Riel School Division. We recognize that forced labour and child labour are significant global human rights issues, and we are committed to assessing and mitigating the risk of these exploitative practices in our supply chain.

As an educational authority, we recognize our responsibility to advance public understanding of the risk of forced labour and child labour, including the need to educate members of the Louis Riel School Division community of the risk of these exploitive practices.

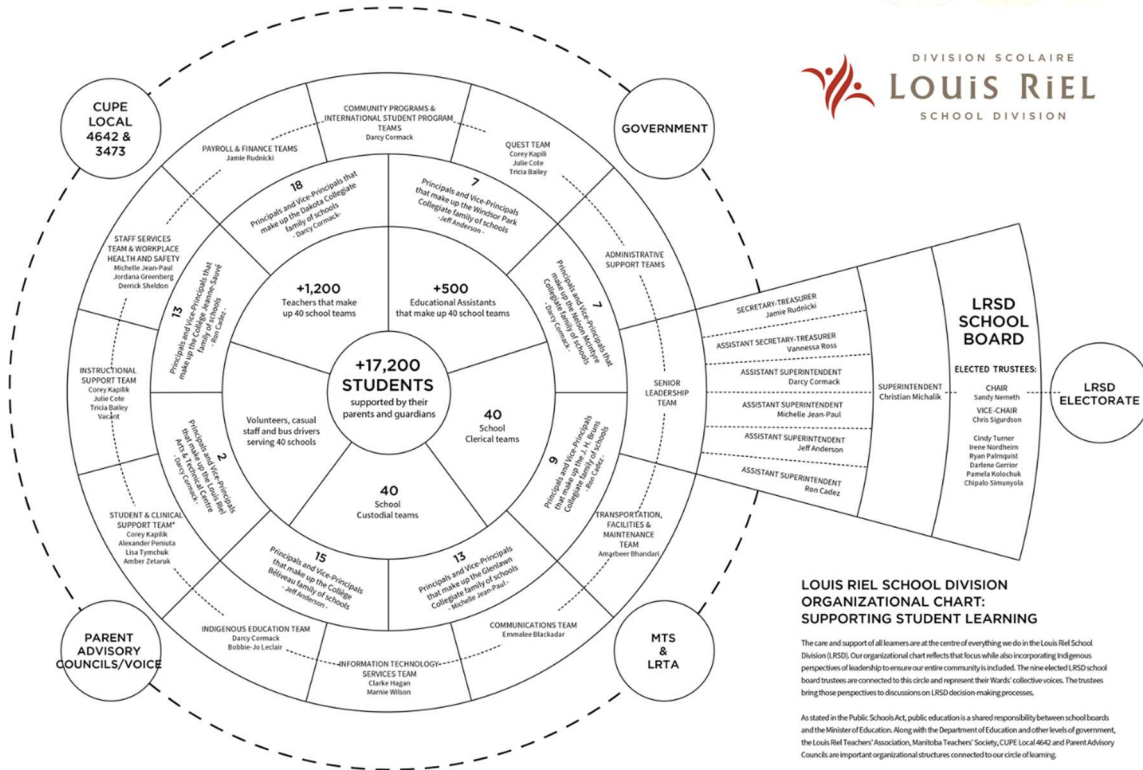
We recognize that risks of forced labour and child labour exist and acknowledge that understanding and managing these risks requires a collaborative approach with our suppliers, our workforce, and other external stakeholders.

Structure

The Louis Riel School Division was established on July 19, 2002, by order of the Minister of Education of the Province of Manitoba by virtue of the authority vested in the minister by Section 7 of the Manitoba Public Schools Act. The Division is a legal body corporate and political sub-division of the Province of Manitoba with powers and duties as outlined in the Manitoba Public Schools Act and its regulations.

The Division encompasses 113 square kilometers within the southeast quadrant of the City of Winnipeg with a compliment of 40 schools and 3 administrative buildings. The Division offers English and French Immersion programming to 17,200 students through the teaching and supports of 2,450 full-time equivalent staff.

The governance structure of the Louis Riel School Division is as follows:



- **Students:** At the center of LRSB operations are the students, supported by their parents and guardians.
- **Front-Line Staff and Volunteers:** This includes teachers, educational assistants, school clerical and custodial teams, bus drivers, and volunteers and casual staff at work in LRSB's 40 schools.
- **School-Level Leaders:** This includes the Principals and Vice-Principals that make up the family of schools connected with each feeder high school.
- **Divisional Departments:** The chart moves from school-level leadership to Divisional departments, including Staff Services, Payroll and Finance, Information Systems, Communications, Facilities, Transportation, Administrative Support, Student and Clinical Services, Indigenous Education, and Instructional Support.
- **Senior Leadership Team:** The Senior Leadership Team forms the senior administrative core of the Louis Riel School Division and reports directly to elected Trustees. In addition to the Superintendent, the Senior Leadership Team includes four Assistant Superintendents, five Directors, and the Secretary-Treasurer.
- **LRSB School Board:** Nine elected Trustees represent four wards in the LRSB community, including a Chair, Vice-Chair, and seven Trustees. Each ward includes two or three representatives that are elected every four years by the electorate in conjunction with the Winnipeg Civic Election.
- **LRSB Community -** The last and most significant layer of the organization chart includes the LRSB community, which elects School Board members every four years to represent them in division governance.

Supply Chain Activities and Identified Risk

To support academic learning and programming, the Division procures a wide range of goods and services in accordance with public procurement law set out by the Public Schools Act of Manitoba and our ethical sourcing principals.

For the 2023-2024 school year, total budgeted operating expenditures is \$223,545,879. Of this, \$36,181,402 of budgeted expenditures have been allocated for purchase of goods and services. In addition, the Division incurs approximately \$57 million in capital and school-based expenditures relating to goods and services.

The Division imported approximately \$1.2 million worth of goods and services into Canada in 2023-2024. This represents approximately 1.29% of the total goods procured in the year, or approximately 0.04% of total annual divisional expenditures.

While the Division recognizes there is a risk of forced labour and child labour across our supply chains, our sourcing is overwhelmingly from countries where the risk of forced labour and child labour is low. We acknowledge, however, that there can be a lack of visibility to the extent of these risks in secondary and deeper supply chain tiers. The chart below reflects the country of origins in which the Division purchases good and services:



Policies and Due Diligence

The Louis Riel School Division affirms the underlying principle of human rights, namely the recognition of the individual worth and dignity of every person. The Division upholds its responsibility to provide learning environments and workplaces free of discrimination and harassment, as prescribed by the Canadian Charter of Rights and Freedoms and the Manitoba Human Rights Code. Divisional policies reaffirming these principals include:

- Policy AC – Respect for Human Diversity
- Policy ACF/ACG – Interpersonal Relations and Resolution of Concerns About Harassment/Discrimination
- Policy ACH – Diversity, Equity & Inclusion
- Policy AE – Accountability: Public Interest Disclosure & Whistleblower Protection
- Policy DJB – Purchasing Procedures

The Secretary Treasurer’s department manages and oversees compliance with procurement directives, legislation, and international trade agreements. The department also manages procurements through collaborative frameworks such as the Canadian Collaborative Procurement Initiative (CCPI), and other consortia like the Metro Winnipeg School Division Purchasing Committee and Canoe Procurement Group of Canada to leverage collective purchasing power and achieve cost efficiencies.

The Division’s purchasing policy (Policy DJB) is reviewed periodically to ensure compliance with federal and provincial legislation and related regulations, as well as domestic and international trade agreements. Policy DJB is principal based with a guiding principle that procedures for the acquisition, regulation, and disposal of divisionally purchased goods and services should strive to model and uphold the highest ethical standards, which includes the commitment to human rights and reinforces our position against the use of forced labour and child labour in our supply chain.

Assessing Forced Labour and Child Labour in Our Supply Chains

The Louis Riel School Division’s greatest risk exposure to forced labour and child labour is through suppliers, and the primary source of these risks come from procuring goods in higher-risk geographies and sectors. We recognize the potential risks of forced labour and child labour in our extended supply chain and the complexity and challenges in operationalizing modern slavery compliance.

We rely on the extensive work done by government to assist us with identifying procurement categories and goods of greater risk of forced labour and child labour and will continue to look to them as leaders in this area.

At the Louis Riel School Division, we based our risk analysis on the categories of goods that are most widely used in our context. We identified products sourced from outside of Canada, where the risk of forced labour and child labour is deemed higher. Based on our supply chain activities, we have assessed the following risks:

- Electronics (e.g. computers and related components)
- Sports equipment (e.g. soccer balls)
- Textiles
- Food (e.g. fruit, coffee, tea)
- Custodial supplies (e.g. rubber gloves)

While the information above represents the current known risks for the Division, it characterizes the findings from our initial supply chain review at a particular time. More work is underway internally to monitor supplier activities efficiently and effectively with respect to forced labour and child labour, and high-risk categories and countries may change in the future as we learn more.

Remediation Measures

The Louis Riel School Division is not aware of instances of forced labour or child labour that requires remediation. Since the Division did not yield any evidence of forced labour or child labour during the current fiscal year, we did not implement any remediation measures. The Division has yet to develop a formal framework to mitigate any potential future risks associated with these practices in our supply chain.

Training and Capacity Building

As an educational authority, we recognize our responsibility to advance understanding of the risk of forced labour and child labour, including the need to educate staff of the Louis Riel School Division community the risk of these exploitive practices. To this end, the Division is committed to developing specific training for staff on forced labour and child labour risks and best practices, beginning with the Secretary-Treasurer's department in Fall 2024. This effort will expand to include other decision makers and suppliers involved in our supply chain activities.

Monitoring Effectiveness

The Division is aware that regular monitoring and assessment of our efforts to mitigate the risk of forced labour and child labour in our operations will be critical. We will develop key performance indicators (KPI's) to align with our efforts in mitigating risk associated with forced labour and child labour in our supply chains. Initial KPI's will include:

- Number of Divisional staff trained
- Number of contracts that include specific language regarding compliance with the Division's policies surrounding force labour and child labour
- Number of imports by geographic area and product categories
- Spend total by geographic area and product categories

Action Plan for the Next Fiscal Year

Identifying and eliminating forced labour and child labour in the global supply chain is a complex social, economic, and governance issue that can only be resolved through partnership and collaboration across industry, suppliers, and government. Collaboration is crucial to developing collective solutions. This requires us to deepen our understanding of our supply chain by building relationships with our supply chain partners, strengthen our contractual language when entering procurement partnerships and to work together to build transparency through effective policies. With this as our framework, the Division will focus on the following:

Learning and Teaching

- Developing specific training for staff on forced labour and child labour risks and best practices, beginning with the Secretary-Treasurer's department in Fall 2024
- Raise awareness among staff regarding forced labour and child labour and measures that we can take to reduce risk of procuring supplies in high-risk geographic areas and product categories

Operations

- Update Divisional policies to specifically reference our commitment to anti-forced labour and anti-child labour practices as part of our affirmation that the underlying principle of human rights, namely the recognition of the individual worth and dignity of every person includes such practices
- Integrate forced labour and child labour due diligence as part of our procurement practices, including wording in the issuance of Request for Proposals and our Purchase Order Terms and Conditions

Approval and 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 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 aspects for the purposes of the Act, for the reporting period listed above.

I have the authority to bind the Louis Riel School Division.



Signature

Name: Sandy Nemeth

Title: Chair of the Louis Riel School Division Board of Trustees

Date: May 31, 2024



Signature

Name: Jamie Rudnicki

Title: Secretary-Treasurer & CFO

Date: May 31, 2024