

# Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains

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Public Safety Canada Report

Issued May 2024

For the fiscal year ending March 31, 2024

## Identifying Information

Reporting entity's legal name:	Grant MacEwan University
Financial reporting year	April 1, 2023, to March 31, 2024
Identification of a revised report	n/a
Business number	107448219
Identification of a joint report	n/a
Identification of reporting obligations in other jurisdictions	n/a
Entity categorization according to the Act	Entity (University)
Sector/industry	Public Sector / Higher Education
Location	Edmonton, Alberta, Canada

## About MacEwan University

Grant MacEwan University is a board-governed, public post-secondary institution operating in Alberta as an Undergraduate University under the authority of the Post-Secondary Learning Act. Established in 1971, the institution has a rich history in its growth from a community college. The university was officially named Grant MacEwan University by an Order in Council in 2009 and was rebranded MacEwan University for communications and marketing purposes in 2013. This report will hereafter refer to the university as “MacEwan University”.

MacEwan University is a young university with a rich past. The university inspires students with a powerful combination of academic excellence and personal learning experiences. Through learner-centred teaching, we connect with our students—creating a unique post-secondary experience that opens up diverse pathways for achievement and growth.

The university provides a transformative education in a collaborative and supportive learning environment. Creativity thrives here—through research and innovation that engages students, faculty and the community.

We are focused on our students – over 18,000 – providing them with choices and opportunities for success with a mix of undergraduate degrees, certificates, diplomas and degree-transfer programs.

MacEwan University’s strategic framework, [Teaching Greatness: Strategic Vision 2030](#), incorporates concepts of motion and change and embodies MacEwan’s history. The vision is bold and aspirational, and it is about redoubling our emphasis on exceptional undergraduate teaching.

In this report, we outline information as required under sections 11(1) and 11(3) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). More specifically, we describe the steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the importation of goods into Canada by MacEwan, and discuss future remediation efforts.

## Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

With respect to subsection 11(1) of the Act, MacEwan University is in the early stages of taking steps to reduce risks, and will begin developing and actioning those steps in the next fiscal year. The university does have policies in place that govern the behaviour of employees. These include:

- Codes of Conduct for [employees](#) and [Board of Governors members](#),
- [Safe Disclosure](#) policy and procedures,
- [Sustainability Policy](#), and
- [Procurement of Goods and Services Policy](#).

Furthermore, the university’s key suppliers in large-spend and high-risk categories of food and beverages, furniture, and computer equipment have provided us with attestations and / or links to their forced labour and child labour policies.

Please see Supplementary Information, Items 2 and 3 for further details.

## Supplementary Information

As per subsection 11(3) of the Act, the following seven categories of supplementary information are provided:

### 1. Reporting Entity, Structure, and Supply Chains

The university operates under a shared governance structure between the Board of Governors (Board) and the General Faculties Council (GFC). The university's culture is reflected in shared governance, which includes considerable engagement and respect for a variety of viewpoints. The trademarks of university decision-making are collaboration, consultation, and cooperation.

Under bicameral governance, the Board has senior oversight of the institution and concerns itself with long-range planning and business affairs. The Board manages and operates the university within its approved mandate, oversees the efficient and effective use of financial and human resources to meet institutional objectives and ensures that institutional risk is appropriately managed.

The GFC, MacEwan University's senior academic governance body, is responsible for the academic affairs of the university such as academic programming and curriculum, academic standards, research and creative activities, academic policies and awards.

MacEwan has a well-defined organizational structure that supports its academic and administrative functions. There are approximately 2,400 full and part-time employees working at the university; all employees work in Canada and are subject to Canadian labour laws.

MacEwan's core business activities are:

- delivering exceptional undergraduate learning, maximizing flexibility to meet students where they are, and preparing MacEwan graduates who are versatile and future-ready through a wider array of experiential learning opportunities, and strategic relationships in the community,
- creating scholarly excellence (advancing research and development initiatives) and engaging learners in scholarships as part of the well-rounded MacEwan experience, and
- engaging with our community.

In addition to these core activities, the university operates a residence for students, on-campus food services, and the MacEwan Bookstore which offers textbooks and course materials, school and art supplies, technology, and a selection of promotional merchandise and apparel.

Supply chain activities related the importation of goods:

MacEwan purchases and in some cases imports goods to support the administration of academic and student services, research and development, marketing and communications, and facilities management. Related supply chain activities include:

- goods and services required for university operations (e.g., information technology, office supplies, lab equipment, facilities management),
- bookstore sale of goods (e.g., textbooks and course materials, school and art supplies, technology, promotional merchandise and apparel),
- athletics (e.g., apparel, equipment, and supplies for sports teams),
- student supplies (e.g., lab supplies, classroom supplies, art supplies),
- acquisition of goods for research (e.g. lab supplies, chemicals, and equipment),
- residence providing accommodation to students, and
- on-campus food and beverage services.

The university's spending on goods purchased in the fiscal year ending March 31, 2024 is approximately \$20M. Of this amount, \$17.3M (91%) is sourced from Canadian suppliers, \$1.5M (8%) is sourced from US suppliers, and \$0.2M (1%) is sourced from suppliers located in France, Great Britain, and Ukraine.

The countries of direct supply (tier one suppliers) are not at-risk countries; however, further analysis is required to determine the countries of indirect supply (tier two, tier three, and suppliers further down the supply chain than tier three suppliers). Indirect suppliers from at-risk countries will then be reviewed for their risks of forced labour and / or child labour.

## 2. Policies and Due Diligence Processes

The university has policies and responsible business conduct practices which govern our activities. These include:

- The university's Codes of Conduct for [employees](#) and [Board of Governors members](#):
  - All employees are expected to act in a way that reflects the place they hold in the public sphere and to maintain the trust and regard expected of the employees of a publicly-assisted undergraduate university.
  - Board of Governors members bear a fiduciary responsibility and are expected to act in the best interests of the university. Although members bring special expertise and points of view to the Board's deliberations, the best interests of the university remain paramount in all Board activities. Members must be conscientious in contributing to and helping the Board fulfill its responsibilities for guiding the university, in defining its mission, planning and goal setting, protecting and furthering its assets, and being responsible for the ethical conduct of its affairs.
- The university's [Safe Disclosure](#) policy and procedures:
  - The university maintains high standards of legal, fiscal and ethical behaviour and fosters a culture of ethics and compliance by encouraging members of the university community to report suspected or actual wrongful conduct, taking appropriate action to investigate reports of wrongful conduct, and protecting members of the university community from reprisal for making such reports.

- The university's [Sustainability Policy](#):
  - MacEwan University is committed to the principle of sustainability in all its operations and to the recognition of the fundamental interdependence of environmental quality, economic prosperity, and social responsibility.
- The university's [Procurement of Goods and Services Policy](#):
  - The university relies on this policy and related procedures to govern our procurement activities. Currently, MacEwan University does not have a policy directly referencing forced labour and / or child labour. However, the university requires some key suppliers providing high-risk identified goods related to forced and / or child labour to submit their sustainability programs during the onboarding process.

## Future Initiatives

MacEwan University will focus its efforts on the following areas to comply with the Act:

- competing a detailed analysis of the countries of indirect supply (tier two, tier three, and suppliers further down the supply chain than tier three suppliers), then reviewing suppliers from at-risk countries for use of forced labour and / or child labour.
- updating existing policies and procedures to ensure they align with the Act's requirements,
- adding reporting requirements related to forced labour and/or child labour in calls for tender of goods,
- updating contract templates to incorporate anti-forced and anti-child labour clauses,
- implementing a Supplier Code of Conduct that reflects the new legislation, and
- training employees and management.

### 3. Business and Supply Chain Risks

Direct suppliers (tier one suppliers) to MacEwan are Canada, US, France, Great Britain, and Ukraine, none of which are at-risk countries.

Our key suppliers in the large-spend and high-risk categories of food and beverages, furniture, and computer equipment have provided us with attestations and / or links to their forced labour and child labour policies.

Further analysis is required of the countries of indirect supply (tier two, tier three, and suppliers further down the supply chain than tier three suppliers).

### 4. Measures Taken to Remediate Forced Labour or Child Labour

No measures have been taken in the reporting year. Further analysis is required as noted in Item 3, to determine what, if any, remediation may be required.

### 5. Measures Taken to Remediate Loss of Income

No measures have been taken in the reporting year. Further analysis is required as noted in Item 3, to determine what, if any, remediation may be required.

## 6. Training

Procurement training at MacEwan is an ongoing activity. Procurement staff have been educated to some extent on Bill S-211, primarily at the supervisory and managerial levels. All procurement staff will be given additional professional training. As well, the university plans to develop ethical procurement training that will include forced labour and child labour. It will be made available to all employees, and will be mandatory for those who hold a responsibility for procurement / contracts / buying in their roles.

## 7. Assessment of Effectiveness

Detailed assessments have not been taken in the reporting year. MacEwan will implement the steps noted in “Future Initiatives” in this report, evaluate the efficacy of those efforts in preventing and mitigating the risks of forced labor and child labor, and develop measurements (KPIs) on the procedures.

## 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 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.

Carolyn Graham  
Board Chair



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Signature

I have the authority to bind Grant MacEwan University

October 24, 2024

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Date