
Forced Labour and Child Labour in Supply Chains

Policy Number:	2401
Owner:	VP FA
Current Approved Date:	June 13, 2024

POLICY STATEMENT

NBCC values leadership with integrity and demonstrates that by taking pride in its collective accountability. All Employees are expected to be accountable for their actions and must exercise due diligence in the procurement of goods (and/or services) for which there is a risk of forced labour and child labour within the relevant supply chain so as to promote public confidence and trust in the College.

PURPOSE

NBCC acknowledges the risk that a supply chain may involve the use of unknown members of its supply chain reliant on forced labour and/or child labour. Though the likelihood of post-secondary education institutions – and specifically NBCC – having business dealings with suppliers relying on such measures is assessed as rare, the impact could be severe¹.

This policy outlines NBCC's commitment to accountability and provides guidance regarding how the College will demonstrate its commitment to combat forced labour and child labour within its supply chains. More specifically, this policy outlines the scope of applicability, relevant definitions, as well as measures proposed to combat forced labour and child labour within NBCC's supply chains.

SCOPE AND LIMITATIONS

This policy applies to NBCC Employees and Partners. Compliance with this policy is a condition of employment.

1.0 DEFINITIONS

Child labour

as defined by Fighting Against Forced Labour and Child Labour in Supply Chains Act (May 11, 2023), means labour or services provided or offered to be provided by persons under the age of 18 years and that

- (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or, requiring them to attempt to combine school attendance with excessively long and heavy work; or

¹

As assessed by NBCC's current Enterprise Risk Framework and methodology.

(d) constitute the worst forms of child labour as defined in Article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999.

College Community Members

any person who studies, teaches, conducts research, or works at or under the auspices of the College, including, but not limited to:

- any person who is an employee of the College;
- Students of the College;
- Visiting Scholars and any other persons while they are acting on behalf of or at the request of the College; and
- a contractor engaged by the College.

Employee

a person who meets the definition of employee under the Public Service Labour Relations Act.

Forced labour

as defined by Fighting Against Forced Labour and Child Labour in Supply Chains Act (May 11, 2023), labour or service provided or offered to be provided by a person under circumstances that

(a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or

(b) constitute forced or compulsory labour as defined in Article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

Partner

including but not limited to visiting scholars, volunteers, contractors, fee-for-service individuals, clients of NBCC, and any other persons while they are acting on behalf of or at the request of the College.

Underage individual

any person who has not reached the minimum legal working age in New Brunswick, currently indicated at 16 years of age.

2.0 IMPLEMENTATION

2.1 Measures to Combat Forced Labour and Child Labour

- 2.1.1 Supply chains need to be continually evaluated in accordance with NBCC's Enterprise Risk Management Framework against the risk of Forced Labour and Child Labour and mitigation activities put in place to minimize that risk.
- 2.1.2 Suppliers and/or supply chains representing risk of Forced Labour and Child Labour shall be reviewed by NBCC.
- 2.1.3 Process shall be put in place to ensure appropriate due diligence is carried out in relation to forced Forced Labour and Child Labour, which may include evaluating human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).

- 2.1.4 NBCC's standard procurement and contract policies, procedures, and documentation shall address Forced Labour and Child Labour as part of due diligence conducted prior to entering into business relationships as well as any reviews, renewals and/or continuation of existing business relationships currently in place.
- 2.1.5 NBCC shall develop or otherwise procure training for employees (including but not limited to Finance department employees) participating in College procurement activity with regard to Forced Labour and Child Labour. This training shall be completed on a timely basis in order to conduct procurement activity on behalf of the College.

2.2 Measures to combat the employment of underaged individuals

- 2.2.1 During the application and pre-screening phase of the application and selection process, the candidate will be required to confirm that they are over the age of 16.
- 2.2.2 NBCC's employment documents shall include a mandatory section where applicants must provide proof of their date of birth. Acceptable documents include, but are not limited to, birth certificates, passports, or government-issued identification.
- 2.2.3 NBCC's People and Culture division will conduct semi-annual audits of employee records to ensure compliance with age-related employment laws. These will be conducted in conjunction with random audits to further ensure compliance and deter any potential violations.
- 2.2.4 NBCC will maintain accurate and up-to-date records of all age verification documents in a secure and confidential manner in accordance with NBCC's retention schedule.

3.0 REPORTING

NBCC College Community Members, including Employees or Partners, may raise any concerns about the College's role in combatting Forced Labour and/or Child Labour in the manner prescribed by NBCC's [Protected Disclosure \(4140\)](#) policy.

4.0 INTERPRETATION

Questions or concerns about the interpretation or application of this policy and/or related procedures may be directed to the Director of Finance or Vice President Finance and Administration.

5.0 OTHER RELATED DOCUMENTS