



# Horizontal Audit of Student Hiring under the Federal Student Work Experience Program



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# Executive summary

## About the audit

The Public Service Commission of Canada (PSC) and the Treasury Board of Canada Secretariat share responsibilities for student employment in the federal public service. The PSC is responsible for recruiting and referring students to hiring departments and agencies. Policy, including program eligibility requirements and terms and conditions of employment, is set out by the Treasury Board.

There are 3 recognized student employment programs in the federal public service: the Federal Student Work Experience Program (FSWEP), the Post-Secondary Co-op/Internship Program and the Research Affiliate Program.

This audit focused on FSWEP as it is the largest of the 3 student programs, employing thousands of students each year. In 2019-20 it accounted for 62% of all student hires. The audit looked at the performance of the staffing system with respect to student hiring under the program and sought to identify areas for improvement.

This audit was conducted to determine if student hires were compliant with key requirements, and to better understand practices and challenges related to the use of the program. The audit team reviewed a sample of 202 student hires, made between April 1, 2018, and March 31, 2019, in 14 departments and agencies, and conducted interviews with departmental representatives.

This audit also considered findings from past PSC oversight work on student programs.

## Main findings

### Compliance with requirements

We found that the appointments examined in our audit were mainly compliant with the program eligibility criteria established by the Treasury Board. This shows that the departments and agencies that participated in our audit have a good understanding of the program's core requirements and apply them well.

However, on the requirement to develop a structured learning plan that sets out the learning goals for a student during their assignment, we noted poor compliance. A similar finding had previously been reported in our [2009 Audit of the Federal Student Work Experience Program and subsequent appointments through bridging mechanism](#).

The audit also found that, in nearly 40% of the appointments examined, departments and agencies had not kept enough information to support their hiring decisions.

All appointments, including student hires, must be made in a fair and transparent manner. Hiring managers using FSWEF must request referrals from the national student inventory managed by the PSC. Students who meet the criteria identified by the hiring managers are then randomly selected and referred. This process is meant to provide equal access to FSWEF opportunities, ensuring that all candidates meeting the criteria have a fair chance of being selected.

We found that in 8 student appointments from 5 of the departments and agencies in our audit, hiring managers may have influenced the referral process to increase the chances of specific students being referred to them. The issue of pre-matching students to jobs and personal favouritism was also noted in past PSC audits and investigations.

Deputy heads are accountable for the application of all appointment authorities delegated to them. They must ensure that appointments are based on merit and free from undue influence, and that assessments are conducted in good faith, free from bias and personal favouritism. This includes student hiring decisions.

## Use of the Federal Student Work Experience Program

As part of the audit, the 14 departments and agencies provided valuable information on their practices and the challenges they faced when recruiting FSWEF students. Our interviews highlighted:

- difficulties related to hiring students in the regions
- an inability to hire part-time students
- a lack of flexibility to hire students referred through other recruitment initiatives

Because of FSWEF limitations, departments and agencies indicated that they chose to hire students as casual workers rather than under the program.

FSWEF appointments form part of a longer-term recruitment strategy to support Canadian students, the needs of departments and agencies, and overall public service renewal. Because of the wide range of students that it attracts and the opportunities that it provides, it is important to ensure that the program is effectively designed and operates in a manner that encourages its use.

# Recommendations and PSC response

The 3 recommendations stemming from this audit are intended to improve the program's use and its ability to support public sector renewal and diversity.

The PSC will work together with departments and agencies to explore ways to enhance program delivery and usability. The PSC will clarify requirements for hiring departments in terms of documentation requirements.

At the same time, deputy heads need to ensure that FSWEH hires within their own departments are free of personal favouritism. Deputy heads should review their practices to protect from personal favouritism and ensure they have the oversight to identify and address it when it occurs.

Current program eligibility requirements exclude part-time students, which make up almost one quarter of all Canadian students. It may be advisable to further explore part-time student demographics to ensure that their exclusion does not result in potential barriers to diversity. In addition, we note, as in our 2009 audit, a low compliance rate with the requirement to have learning plans in place for student hires. These observations have been brought to the attention of the Treasury Board of Canada Secretariat for their consideration.

## Introduction

The Public Service Commission of Canada (PSC) is responsible for promoting and safeguarding a merit-based, representative and non-partisan federal public service. To fulfill its accountability to Parliament for overseeing the integrity of the public service staffing system, the PSC undertakes audits, investigations, and research activities to assess performance against intended outcomes and to examine systemic staffing risks.

## Context

### Student employment programs

Through its student employment programs, the federal public service provides work opportunities to students across Canada. Because qualified students can later become public servants, student hiring is also an important source of renewal for the public service. It allows for the future recruitment of a talented and diverse workforce, with a broad set of skills and perspectives.

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For fiscal year 2019–20, 15 134 students were hired under the 3 main student employment programs:

- the Federal Student Work Experience Program (FSWEP) accounted for 62% (9 423) of student hires
- the Post-Secondary Co-op/Internship Program accounted for 37% (5 626) of student hires
- the Research Affiliate Program accounted for less than 1% (85) of student hires

FSWEP is the largest program that provides students with work experience in the federal public service. Since 1990, it has offered thousands of student work opportunities every year. It recruits secondary and post-secondary students from across the country and all academic disciplines and demographic backgrounds. Through the program's main inventory, which as of May 2021 included close to 61 000 students, organizations can request student referrals, based on criteria such as job type or academic field of study, that correspond to the jobs offered. The program also supports a diverse student workforce by allowing hiring managers to target employment equity groups, through inventories for Indigenous students and students with disabilities.

The other 2 student programs are more focused in scope. The Post-Secondary Co-op/Internship Program provides work placements to co-op students in their field of study and offers supervised, on-the-job training assignments. The Research Affiliate Program provides part-time work opportunities for students who need applied research experience in supervised laboratory or field analysis to graduate.

All 3 programs are designed to enrich students' academic studies, enable them to develop their skills, enhance their employability, and offer insights into future career options within the federal public service. Once they complete their studies, students in these programs can be appointed to federal public service positions as long as they meet the merit criteria and conditions of employment. For 2019–20, 16.3% of external indeterminate (permanent) and term (temporary) hires in the public service had previous experience under a federal student employment program. Student programs provide a significant source of new talent and workforce renewal for the Canadian public service.

The audit focused on FSWEP as the largest student program and an important entry point into the federal public service for many students with diverse profiles and backgrounds from across the country.

## Roles and responsibilities

The PSC and the Treasury Board of Canada Secretariat share responsibilities for student employment in the federal public service. The PSC is responsible for recruiting and referring students to hiring departments and agencies. The Treasury Board is responsible to set policy, including program eligibility requirements, and terms and conditions of employment.

The Treasury Board [Directive on Student Employment](#), which came into effect on April 1, 2020, establishes the eligibility criteria for students to work in the core public administration and the responsibilities of managers when hiring students. This directive replaced the [Student Employment Policy](#) that was in effect during our audit. The new directive did not have an impact on FSWEP appointment compliance requirements examined in this audit.

Within its authority under the [Public Service Employment Act](#), the PSC establishes the statutory instruments<sup>1</sup> and the policy framework to provide for appointments under the approved student programs. The Treasury Board [Policy on People Management](#) which came into effect on April 1<sup>st</sup>, 2020, states that the PSC is responsible for the recruitment and administration of student employment or internship programs established by the Treasury Board. The PSC manages the recruitment and referral of FSWEP candidates for student employment. It also maintains the national online inventory where students can apply for work opportunities by creating their profile. The profile includes professional interests, current academic level, and field of study.

The PSC refers a selection of available students to the hiring department or agency, based on a matching of student profile skills to the job requirements identified by the hiring manager. Job requirements can include specific academic disciplines. The PSC's referral approach for student candidates is integral to the program's design. It is meant to safeguard equal access to FSWEP opportunities and to ensure that candidates meeting the selection criteria have a fair chance of being selected.

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<sup>1</sup> The [Student Employment Programs Participants Exclusion Approval Order](#) and [Student Employment Programs Participants Regulations](#) outline parameters for student appointment into student programs.

# Why we conducted this audit

This audit is part of a series of oversight activities the PSC undertakes on student hires. In 2009, the PSC published an [Audit of the Federal Student Work Experience Program and subsequent appointments through bridging mechanism](#). In 2014, the PSC and the Treasury Board of Canada Secretariat conducted a joint horizontal [Follow-Up Study to the Evaluation of the Post-Secondary Recruitment Program and Other Recruitment Methods into the Public Service](#) to examine the relevance and performance of the administration of Student Employment Programs. In addition, through its research function, the PSC regularly monitors student recruitment activities to examine hiring trends and program results.

When hiring FSWEPP students, managers must ensure that the appointments meet key legislative and policy requirements of the program, such as the eligibility criteria established by the Treasury Board. Past PSC investigations and our 2009 audit have found that some students were hired or re-hired under FSWEPP without meeting program eligibility requirements.

Concerns of favouritism or other forms of improper conduct in student hires have also been reported in the [2009 Audit of the Federal Student Work Experience Program and subsequent appointments through bridging mechanism](#), as well as in the context of recent PSC investigations. These are instances where hiring managers have manipulated the PSC student referral system, often by tailoring their request to target specific students registered in the inventory. To preserve the integrity of the staffing system, FSWEPP appointments must be conducted in good faith and free from personal favouritism.

Student employment programs were designed to provide work experience for students and to recruit and develop the next generation of public servants. They are meant to provide meaningful work, supported by learning plans, allowing students to learn, develop their skills and enhance their employability.

Between April 1, 2014, and March 31, 2019, the annual number of public service student hires went from 11,146 to 13,603, representing a 22% increase. During the same period, based on PSC data analysis, we observed a 79.7% increase in the number of students

being hired as casual workers as opposed to established student programs.<sup>2</sup> While it is possible to hire students on a casual basis, casual hiring is intended to meet short-term, unforeseen, and urgent operational needs, and is not intended as a mechanism to support public service renewal.

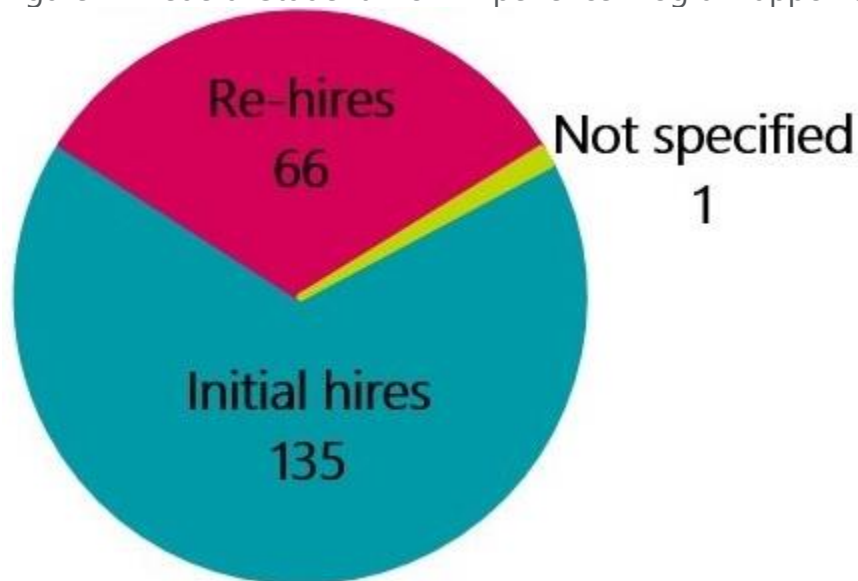
The PSC undertook this audit to explore and address these issues. We looked at the level of compliance of student hires with the program. We also examined risk factors to ensure that managers were not hiring known individuals at the expense of providing fair access to all students. And finally, we sought to ensure that challenges in administering the program were not reducing its usability and causing hiring managers to use other mechanisms such as casual employment to hire students.

## Audit objective and scope

The audit had 2 objectives:

- to determine if FSWEP hires are compliant with key legislative, policy and regulatory requirements
- to better understand practices and challenges related to the use of FSWEP

Figure 1 - Federal Student Work Experience Program appointments by type



<sup>2</sup> Casual employment is a 90-day resourcing option to meet short-term, unforeseen and urgent operational needs of a department or agency. The appointment process for casual employment is exempt from the application of merit as established in the *Public Service Employment Act*.

Text version

The sample included 66 re-hires, 135 initial hires and 1 was not specified.

The audit scope included the review of a sample of 202 student hires made between April 1, 2018, and March 31, 2019, across 14 departments and agencies of various sizes (Annex A provides more details about the audit). To ensure that the audit covered a wide range of FSWEPP appointments and related practices, the sample included initial hires and re-hires made across Canada.

The review of student hires and re-hires examined compliance with employment eligibility criteria and other key requirements. Interviews were held with departmental representatives from the 14 participating departments and agencies.

This allowed us to gather intelligence on departmental practices related to the use of the program, as well as information on challenges faced by departments and agencies when recruiting FSWEPP students.

## Compliance of Federal Student Work Experience Program appointments

### Program eligibility requirements were met in most appointments

We reviewed a sample of 202 appointments and interviewed departmental representatives to determine if students hired were eligible to these employment opportunities.

As per the [Student Employment Policy](#) and the [Directive on Student Employment](#) that replaced it, students must be registered as full-time secondary or post-secondary students in an accredited academic institution while they work in the public service.

During our interviews, all 14 representatives confirmed that their department or agency had procedures to ensure that students hired through the program were registered on a full-time basis with their institutions. They also reported using a variety of methods to validate that students were in full-time attendance, including:

- student's course schedule
- student's attestation
- student's résumé
- manager's attestation

We found proof of full-time registration in more than 80% of the 202 appointments reviewed.

Another requirement of both the policy and the directive was that students hired be returning to full-time studies in the next academic term. This requirement did not apply to students who were in their final year of academic study. While there is no prescribed method for departments and agencies to obtain such assurance, the audit team reviewed FSWEF appointments for supporting documentation, including:

- academic institution's confirmation of full-time registration for the next semester
- student's attestation of intent to return to full-time studies in the next semester
- registration fees receipt or course schedule
- other supporting evidence that suggests the student was enrolled in a multi-year academic program on a full-time basis

Evidence of a return or intent to return to full-time studies in the next academic semester was found in 94% of appointments where the requirement applied.

Individuals previously employed under a public service student program may be re-hired as FSWEF students directly by the hiring department or agency, as long as they continue to meet the program eligibility criteria. In these cases, departments and agencies do not have to request student referrals from the PSC inventory. The audit reviewed appointments in the sample that were processed as re-hires and verified that those students had been hired under one of the approved student employment programs in the past, making them eligible for FSWEF re-employment. The audit found that 100% of re-hires examined met this requirement.

# Few appointments provided structured learning plans for the students

The [Student Employment Policy](#) required a structured learning plan setting out what the student should accomplish during their assignment. The more recent [Directive on Student Employment](#) also requires structured learning plans.

During our interviews, we noted that the requirement for structured learning plans was not known by most departments and agencies. This was confirmed in our audit sample, where we found that structured learning plans had been developed in less than 18% of the 202 appointments reviewed.

Our 2009 Audit reported a low compliance rate (7%) with regards to the requirement to develop learning plans. In that particular audit, the PSC recommended that the Treasury Board of Canada Secretariat review the continued relevance of the requirement for learning plans. As noted, with the introduction of the new Treasury Board [Directive on Student Employment](#) in April 2020, learning plans continue to be required for all student hires.

Structured learning plans support work-integrated learning models, which have been adopted by a number of Canadian academic institutions. These models integrate a student's academic studies within a workplace, such as the federal public service. They allow students to complement their academic curriculum with on-the-job working experience and include learning outcomes related to employability.

Structured learning plans ensure that students, through their work assignments, can benefit from a rewarding and constructive work experience. This is so that they can gain the skills and competencies they need to enhance their employability, which can include future career options in the federal public service. The low level of compliance and information gathered from our interviews indicate that managers need to be made more aware of this requirement.

We have brought this observation to the attention of the Treasury Board of Canada Secretariat.

## Some appointments raised concerns about adherence to staffing values

The PSC delegates its appointment authorities under the *Public Service Employment Act* to deputy heads, who may sub-delegate these authorities to their managers. Deputy heads are accountable to the PSC for how delegated authorities are exercised in their departments and agencies. Under the PSC's appointment framework, which includes the [Appointment Policy](#) and the [Appointment Delegation and Accountability Instrument](#), deputy heads are to ensure that appointment processes are conducted in a fair and transparent manner and in good faith.

The [Student Employment Programs Participants Regulations](#) were established to support the *Public Service Employment Act*. These regulations state that a person may be appointed to the public service under a student employment program only if they meet the qualifications for the work to be performed and if the appointment is free from personal favouritism.

Through the student referral system, hiring managers identify key inventory search criteria, such as area of study required, academic level or work type. The PSC then proceeds to find students who match those criteria through a search in the FSWEP inventory. The PSC student referral system was designed to ensure that all candidates have a fair chance of being selected and to mitigate the risk of hiring managers targeting specific students in the inventory.

We reviewed our random sample of 135 student appointments where the hiring managers had accessed the PSC student referral system for new appointments. In 8 appointments from 5 organizations, we found indicators that the student referral system may have been manipulated to maximize the chances of specific students being referred to the organization. The following indicators were observed:

- the search criterion for education was not related to the work to be performed
- the manager requested a large number or all students meeting the search criteria despite having only one opportunity to offer
- the hired student was already working for the hiring manager, or the department or agency, under a different type of employment
- the appointment documentation had been prepared before the student was referred by the PSC

## Exhibit 1 – Examples of potential improper conduct found in FSWEP appointments

- In one appointment, the manager requested kinesiology students for a service desk agent position in human resources. As well, the organization had already created a staffing file, dated a staffing action request, signed an impartiality statement, and requested security clearance for the student hired before that person was even referred by the PSC. This suggests that the search criteria used to generate the student referrals were intended to match the desired student's FSWEP profile rather than the actual requirements of the job.
- In another appointment, the organization first requested 20 referrals from the inventory. A second request for 10 more referrals, followed by a third request for another 20 were also made. The student hired ended up being referred in a fourth request for 15 more referrals from the inventory. The decision to select the hired student was made on the basis of experience working in a deputy minister or minister's office, which only a handful of students having already worked within a government organization could possess. As well, when hired under the program, the student was already reporting to the hiring manager as a casual employee.
- In the case of an FSWEP appointment in a regional office, the organization hired one of their own employees who was completing Juris Doctor law studies while on educational leave. In the weeks before the appointment, the employee contacted the organization about the possibility of being selected and hired as a student from the inventory. The organization then submitted a request to the PSC, asking for referrals of students in their first year of a bachelor's degree in a Juris Doctor program.

The PSC has exclusive authority to investigate external appointments when:

- there are concerns that an appointment or proposed appointment may not have been based on merit
- there may have been an error, omission or improper conduct that affected the selection of the person appointed or proposed for appointment

The PSC also has exclusive authority to investigate internal and external processes when fraud is alleged to have occurred. Since FSWEP hires are external appointments, the

8 cases where the audit has identified concerns have been referred to the PSC's Investigations Directorate for further review.

It is concerning that 6% (8 of 135) of the appointments needed to be referred to investigations. These appointments were made by one-third (5 of 14) of the departments and agencies in our sample. While our 2009 Audit used a different methodology, it also found instances where FSWEF appointments showed evidence of pre-matching individuals that were identified in advance.

All hiring managers who are sub-delegated the authority to make appointments must sign an attestation form. The form highlights staffing requirements that are non-discretionary and fundamental to the integrity of the staffing system. These requirements include appointments that are based on merit and free from undue influence, and assessments that are conducted in good faith, free from bias and personal favouritism. This applies to all appointments and appointment-related authorities, including student hiring.

## Lack of documentation to support hiring decisions

We expected departments and agencies to keep enough documentation to support their hiring decisions. It is important, for accountability purposes, to document how the requirements of the student program were met and how the selection and appointment decisions were made.

We found that for nearly 40% of appointments reviewed, departments and agencies had not documented the information that was required to support their hiring decisions. We were looking for information such as the hired person's application, the referral request and the list of candidates referred by the PSC to determine how the selection decision was made.

The PSC's [Appointment Policy](#) sets out the information requirements for appointments, and much of this information includes documents typically found in appointment processes conducted to fill term or indeterminate positions. The policy does not include student-specific information requirements, such as evidence that eligibility criteria of student programs are met. An FSWEF information page for hiring managers on the PSC's website indicates that departments and agencies must, at a minimum, retain the signed offer of appointment, the oath or solemn affirmation, and the [Affirmation of Aboriginal Affiliation Form](#) if applicable.

Our finding signals the need for the PSC to ensure that there is clarity in documentation requirements for hiring managers related to student hiring decisions.

## Challenges in recruiting students to the program

FSWEP provides students from across Canada with work experience and allows the public service to benefit from new and diverse talents. Students are given an opportunity to determine if future public sector employment is a good career choice for them, while enriching their academic programs and developing their skills.

Managers can assess whether the students they hire meet the longer-term needs of their department or agency and could be considered for appointment into a position once they graduate. It is important for the renewal of the federal public service that hiring managers continue to make use of the program. As part of the audit, we conducted interviews to better understand the factors that affect the use of the program.

## Difficulty hiring students in the regions

Some departments and agencies identified challenges related to student hiring in regions across Canada, outside the National Capital Region (NCR). These included difficulties finding bilingual students, a lack of specialized regional students available in the inventory, a lack of visibility of job opportunities in the regions and little knowledge of the FSWEP program outside the NCR.

In 2019–20, recruitment of new public servants in the NCR accounted for 53.2% (30 537) of all public service new hires, a proportion that has been increasing over the past 10 years. During that same fiscal year, approximately 57% of all student hiring activities were for student jobs in the NCR.

It will be important for the federal public service to continue to improve its regional presence, including its outreach to students outside the NCR.



## Limits of the referral process

The ability to hire first-time students using only the PSC student referral system was cited as a challenge by many departments and agencies participating in our audit. The process provides all students from the inventory with a fair chance of being considered and selected, but it makes it challenging to hire students identified through other recruitment platforms such as post-secondary job fairs.

In our audit interviews, 9 out of the 14 departments and agencies indicated that they want more flexibility when recruiting first-time FSWEF students. They expressed their desire for a student recruitment approach that would allow them to hire a student they had already identified through other means.

Departments and agencies indicated that they hired students as casual workers because this was the only way to hire a student they had met or had been referred outside of the FSWEF inventory. From our interviews, we noted the following reasons for using casual employment over student employment programs.

**Table 1: Reasons given by departments and agencies for hiring students as casual workers**

Reasons for hiring students as casual workers	Number of departments and agencies
FSWEF eligibility criteria are too restrictive	4
Offers better salary	5
More convenient	7
Can select the desired student outside of the PSC student referral system	10

Table 1: Departments and agencies gave various reasons for hiring students as casual workers:

- 4 indicated that the FSWEF eligibility criteria are too restrictive

- 5 mentioned that it offers better salary
- 7 said it is more convenient
- 10 indicated that it allows them to select the desired student outside of the PSC student referral system

## Eligibility criteria exclude part-time students

As shown in Table 1, some departments and agencies mentioned that they found the FSWEF eligibility criteria too restrictive; this includes the requirement that students be registered for full-time studies.

According to data available from Statistics Canada, in 2018–19, there were approximately 500,000 post-secondary part-time students, which represents 23% of the student population.<sup>3</sup> Women make up just under 60% of both the total and part-time student populations. Excluding part-time students from program eligibility means that almost one quarter of all Canadian students do not have access to federal student employment. As the demographic characteristics of the part-time student population is not well known, whether such a restriction constitutes a potential barrier to diversity needs to be further explored.

It may be advisable to further explore part-time student demographics to ensure that their exclusion is not posing potential barriers. Given the eligibility requirement to be registered as a full-time student stems from the Directive on Student Employment, we have shared this observation with the Treasury Board of Canada Secretariat for their consideration.

## Students hired as casual workers

The challenges and limitations of FSWEF identified by the departments and agencies participating in this audit shed light on why, in certain circumstances, they choose to hire students as casual workers rather than through the program. While departments are not prohibited from hiring students as casual workers, FSWEF appointments and casual employment are distinctive resourcing options that serve different needs.

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<sup>3</sup> Statistics Canada. [Postsecondary enrolments, by registration status, institution type, status of student in Canada and gender](#)

Casual employment is generally intended to meet short-term, unforeseen, and urgent operational needs. Casual workers are most often hired as short-term replacements and to help manage heavy workloads. At the more senior levels, casual workers can be used to bring in expertise to support a special project or to transfer knowledge. Casual employment provides the flexibility to rapidly recruit a person for the work to be performed. However, casual workers can be hired in a particular department or agency for specified periods lasting no more than 90 working days in one calendar year.

FSWEP is meant to provide meaningful work experience to students while giving them the opportunity to explore career paths in the federal public service. Students are supported in their learning goals through a structured learning plan during their assignment. Through the national FSWEP inventory, hiring departments and agencies have access to students with a wide range of profiles. Under the program, students can be hired several times within a year and throughout their studies, with no limits on length of employment. Jobs may be extended for as long as the student continues to meet the student employment eligibility criteria.

FSWEP appointments form part of a longer-term recruitment strategy to support students as well as the needs of departments and agencies, and the overall renewal of the public service. Because of the wide range of students that it attracts and the opportunities that it provides, it is important to ensure that the program is effectively designed and operates efficiently to encourage hiring managers to use it.

## Conclusion

We undertook this audit to provide assurance that FSWEP appointments complied with program requirements and to better understand current practices and challenges related to its use.

Overall, we found that FSWEP hires examined in our audit sample met most program eligibility criteria. This shows that the departments and agencies that participated in our audit have a good understanding of the program's core requirements and apply them well.

We noted however that departments and agencies did not always keep enough documentation to support their hiring decisions. More clarity from the PSC on what information is required when hiring students under FSWEP would be beneficial as these appointments differ from regular staffing processes.

**Our current and past audit work has revealed poor compliance on the part of hiring managers with the requirement in the Directive on Student Employment to develop a structured learning plan for student hires. In light of this continued low compliance, we have brought this observation to the attention of the Treasury Board of Canada Secretariat for their further consideration.** As a lack of awareness appears to be a root cause of this deficiency, it will be important to ensure that hiring managers are made aware of this requirement.

The audit also examined if student hires were free from personal favouritism. In 8 appointments from 5 organizations, the audit found indicators that the student referral system may have been manipulated to maximize the chances of specific students being referred to the organization. The [2009 Audit of the Federal Student Work Experience Program and subsequent appointments through bridging mechanism](#) also raised similar issues. This is a concerning finding; it highlights that deputy heads must ensure that all FSWEF student applicants are considered fairly and appointed free of any attempts to influence the referral process. Instances of potential personal favouritism towards specific candidates pose a risk to the integrity and fairness of the student referral system.

Interviews conducted with the departments and agencies that participated in this audit provided useful information on challenges they face when recruiting FSWEF students. Challenges identified include difficulties in hiring students in the regions, a lack of flexibility to hire students found through other recruitment initiatives, and the inability to hire part-time students. Excluding part-time students from program eligibility means that almost one quarter of all Canadian students do not have access to federal student employment.

**It is considered advisable to further explore part-time student demographics to ensure that their exclusion does not result in potential barriers to diversity. The PSC has shared this observation with the Treasury Board of Canada Secretariat for consideration as program eligibility is set in the Treasury Board Directive on Student Employment.**

There are many benefits to using FSWEF. However, certain limitations of the program may restrict its use and cause hiring managers to choose other hiring options, such as casual employment. FSWEF appointments and casual employment are very different resourcing options for managers. Casual workers are generally employed to meet short-term, unforeseen and urgent operational needs. Student programs, on the other hand,

were established to provide employment opportunities for students that enable them to develop their skills, enhance their employability and offer insights into potential future career options within the federal public service.

The recommendations stemming from this audit are intended to support improvements to the program. They aim to ensure that FSWEF provides valuable work experience to students across Canada and that departments and agencies can rely on a student recruitment program that serves their needs effectively.

In keeping with the principle of shared accountability for the integrity of staffing, deputy heads should consider the results of this audit within their own departmental context and identify areas where adjustments may be required.

## Recommendations

**Recommendation 1:** The PSC should, in collaboration with departments and agencies, explore new approaches to optimize the use of FSWEF.

**Recommendation 2:** Deputy heads should provide enough oversight over student hiring decisions within their departments and agencies to ensure they are made in good faith and free from personal favouritism.

**Recommendation 3:** The PSC should clarify what documentation is required to support student hiring decisions.

## Public Service Commission response

Student hiring continues to be a fundamental part of our staffing system. Students complement our workforce, increasing capacity and bringing in new skills and competencies. Student hiring also represents a pipeline of talent, supporting public service renewal by drawing from the rich diversity of students from across the country.

We recognize that managers are looking to hire quickly, and increasingly, to use targeted recruitment strategies to find students with unique expertise and skills, and to build a diverse workforce. Yet with over 60 000 students vying for a limited number of FSWEF opportunities (close to 9 000 a year), we also need to think about fair access for students looking for employment.

The PSC commits to engaging with departments to look at ways to allow more flexibility in student hiring, balancing targeted recruitment with the principle of fair access. Based

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on these consultations, the PSC will explore administration options to enhance program delivery and will engage Treasury Board of Canada Secretariat on the implementation of solutions.

While we look to enhance the program, we call on deputy heads to look at the controls in place to protect against personal favouritism. Deputy heads should review their practices to protect from personal favouritism and ensure that they have the right level of oversight to identify and address it when it does occur.

The PSC will also clarify documentation requirements for student hires, to support departments and agencies in ensuring the necessary records are in place to effectively oversee these hires.

While these measures will strengthen the integrity and effectiveness of the program, we will also continue to monitor their application to ensure progress and that the program continues to meet hiring manager needs.

## Annex A: About the audit

The planning and examination phase of this audit were undertaken under the Student Employment Policy in effect up until March 31<sup>st</sup>, 2020.

The [Policy on People Management](#) which came into effect on April 1<sup>st</sup>, 2020, states that the PSC is responsible for the recruitment and administration of student employment or internship programs established by the Treasury Board. It also states that the PSC is responsible for identifying and eliminating barriers in recruitment and staffing.

Representatives of Treasury Board of Canada Secretariat were consulted at the planning and reporting stages of this audit.

### Audit objectives

The objectives of the *Horizontal Audit of Student Hiring under the Federal Student Work Experience Program* were:

- to determine if student hires under the FSWEPP are compliant with key legislative, policy and regulatory requirements
- to better understand practices and challenges related to the use of FSWEPP

## Scope and methodology

The audit covered student hiring activities during the period of April 1, 2018, to March 31, 2019. The audit methodology included the following:

- a review of departmental FSWEF frameworks, including roles and responsibilities
- the audit did not examine the use of other student employment programs such as the Research Affiliate Program and the Post-Secondary Co-op/Internship Program.
- interviews with departmental representatives to understand factors influencing the use of FSWEF, including why departments and agencies choose to hire students using other hiring mechanisms, such as casual employment.
- a review of information related to hires and re-hires to determine compliance with some key requirements:
  - students must be registered to full-time secondary or post-secondary studies
  - students must be returning to full-time studies in the next academic term
  - re-hired students must have been previously hired under one of the student employment programs
  - a structured learning plan defining what the student should accomplish was developed
  - appointments are free from personal favouritism or political influence
  - information is available to support hiring decisions
- validation of full-time student status directly with academic institutions to determine compliance with eligibility criteria
  - for all appointments in the audit sample, the initial intent was to seek confirmation of student full-time registration directly with the academic institutions
  - due to the restrictions of the COVID-19 pandemic, it was not possible to validate the information with the institutions, as some academic services were closed during the audit

The audit included the review of a sample of 202 FSWEF appointments made during the audit scope period.

- The appointments were randomly selected from across 14 departments and agencies of various sizes.
  - a 2-stage design was chosen to control the number of departments and agencies and appointments in the audit

- departments and agencies were randomly selected in a first stage, followed by FSWEPP appointments in a second stage
- due to operational considerations, the number of departments and agencies included in the audit was capped at 14, while the number of FSWEPP appointments was set to approximately 200
- To ensure that the audit covered a wide range of FSWEPP appointments and related practices, the sample included initial hires which accounted for two-thirds of appointments examined, as well as re-hires that represented the remaining third.
- The audit examined FSWEPP hires made both in the National Capital Region and in regions.

**Table 2: Federal Student Work Experience Program appointments examined by location**

<b>Location</b>	<b>Appointments examined in the audit</b>
Not specified	1
Newfoundland and Labrador	1
Prince Edward Island	2
Saskatchewan	3
Alberta	5
Nova Scotia	5
Manitoba	6
New Brunswick	8
British Columbia	13
Ontario (except NCR)	21
Quebec (except NCR)	29
National Capital Region (NCR)	108
<b>Total</b>	<b>202</b>

## Participating departments and agencies

The PSC thanks the departments and agencies included in this audit for providing appointment files and information to support our audit work.

**Table 3: Participating departments and agencies, and number of appointments examined**

<b>Departments and agencies</b>	<b>Appointments examined in the audit</b>
Atlantic Canada Opportunities Agency	2
Canada Border Services Agency	47
Canadian Grain Commission	3
Canadian Intergovernmental Conference Secretariat	3
Department of Justice Canada	18
Environment and Climate Change Canada	26
Federal Economic Development Agency for Southern Ontario	6
Library and Archives Canada	8
Parole Board of Canada	7
Royal Canadian Mounted Police	22
Shared Services Canada	27
Women and Gender Equality Canada	4
Transport Canada	23
Western Economic Diversification Canada	6
<b>Total</b>	<b>202</b>