



Civilian Review and
Complaints Commission
for the RCMP

Commission civile d'examen
et de traitement des plaintes
relatives à la GRC

Civilian Review and Complaints Commission for the RCMP (CRCC)

Forced Labour in Canadian Supply Chains

Reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

2023-24

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Aussi disponible en français.

PART 1 : IDENTIFYING INFORMATION

*** Name of government institution:**

Civilian Review and Complaints Commission for the RCMP (CRCC)

*** Financial reporting year (start date, end date):**

April 1, 2023, to March 31, 2024

Indicate if this is a revised report

This is the first report submitted by the CRCC.

Indicate if this is a report produced by a federal Crown corporation or a subsidiary of a federal Crown corporation

Not applicable

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Civilian Review and Complaints Commission for the RCMP (CRCC) Annual Report

2.1 Information on the government institution's structure, activities and supply chains

*** Which of the following accurately describes the government institution's activities?**

- Purchasing goods
 - in Canada

The CRCC operates domestically only.

*** Provide additional information on the government institution's structure, activities and supply chains.**

The Civilian Review and Complaints Commission for the RCMP (CRCC) is an agency of the federal government, distinct and independent from the RCMP with one hundred and two employees.

Mandate

As set out in Parts VI and VII of the *Royal Canadian Mounted Police Act*, the mandate of the Commission is to:

- receive complaints from the public about the conduct of RCMP members;
- conduct reviews when complainants are not satisfied with the RCMP's handling of their complaints;
- initiate complaints and investigations into RCMP conduct when it is in the public interest to do so;
- review specified activities;
- report findings and make recommendations; and
- promote public awareness of the complaint process.

The CRCC has an office in Canada and purchases goods in Canada. The CRCC purchases goods for its own organizational use to carry out its mandate. The majority of the goods purchased are commercial-off-the-shelf (COTS).

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For this reporting period, the types of goods that the CRCC purchased include information technology equipment, communications equipment, periodicals, office supplies, office equipment, and office furniture. Goods are purchased in Canada. It is not known where the goods are produced, processed or manufactured.

The CRCC purchases were made using Public Services and Procurement Canada's (PSPC) tools such as Standing Offers and Supply Arrangements.

Since November 2021, PSPC implemented anti-forced labour clauses in all goods contracts to ensure that it can terminate contracts where there is credible information that the goods have been produced in whole or in part by forced labour or human trafficking. Additionally, since November 2, 2023, all PSPC Standing Offers and Supply Arrangements for goods that have been issued, amended, or refreshed include anti-forced labour clauses.

As such, all of our contracts for goods resulting from the use of these tools include clauses relating to force labour, which set out, among other things, human rights and labour rights requirements. These clauses can be found in the [policy notification 150-Anti-forced labour requirements](#).

(b) Its policies and due diligence processes in relation to forced labour and child labour.

2.2 Information on 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 produced, purchased or distributed by the government institution

*** Indicate steps taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods produced, purchased, or distributed by the government institution.**

- Other, please specify

The CRCC adheres to procedures and policies for procurements within the PSPC Standing Offers and Supply Arrangements, which have anti-forced labour and child labour clauses in place.

Going forward, the CRCC will monitor suppliers and incorporate clauses and criteria into its own procurements.

If applicable, please provide additional information describing the steps taken.

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The CRCC will integrate PSPC's updated General Conditions for goods and contracts and PSPC's [Code of Conduct for Procurement](#) in its purchasing activities.

In addition, to prevent and reduce the risk of forced labour in our procurements, the CRCC has used the following PSPC tools:

- Standing Offers
- Supply Arrangements

2.3 Information on the policies and due diligence processes in relation to forced labour and child labour

*** Does the government institution currently have policies and due diligence processes in place related to forced labour and/or child labour? (Yes or No)**

Yes.

The CRCC incorporates policies and due diligence through the PSPC Standing Offers and Supply Arrangements, as they have embedded clauses.

* If yes, which of the following elements of the due diligence process has the government institution implemented in relation to forced labour and/or child labour?

- Embedding responsible business conduct into policies and management systems

If applicable, please provide additional information on the government institution's policies and due diligence processes in relation to forced labour and child labour

Effective April 1, 2023, amendments to the [Treasury Board Directive on the Management of Procurement](#) require contracting authorities from all departments listed in Schedules I, I.1 and II of the [Financial Administration Act](#) (with the exception of the Canada Revenue Agency) and commissions established in accordance with the [Inquiries Act](#) and designated as a department for the purposes of the [Financial Administration Act](#) to incorporate the [Code of Conduct for Procurement](#) ("the Code") into their procurements.

The code requires that vendors, providing goods and services to the Government of Canada and their sub-contractors, comply with all applicable laws and regulations. In addition, the Code requires vendors and subcontractors to comply with Canada's prohibition on the importation of goods purchased, in whole or in part, by forced or compulsory labour. This included forced or compulsory child labour and applies to all goods, regardless of their country of origin.

The prohibition on the importation of goods produced wholly or in part by forced labour came into force under the Customs Tariff on July 1, 2020. This amendment implemented a commitment in

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the Labour Chapter of the Canada-United States-Mexico Agreement (CUSMA) and applies to all imports, regardless of origin.

(c) the parts of its activities and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk

The CRCC has used the PSPC Standing Offers and Supply Arrangements, which have the Code of Conduct for Procurement embedded in them.

2.4 Information on the parts of its activities and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage that risk.

*** Has the government institution identified the parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

- Yes, we have started the process of identifying risks, but there are still gaps in our assessments.

In May 2021, a risk analysis of PSPC's supply chains was completed by Rights Lab, of the University of Nottingham (U.K.), to determine which goods were at the highest risk of exposure to human trafficking, forced labour, and child labour. The analysis, and subsequent report, elaborated key strategies for PSPC to leverage public spending power to raise awareness about forced labour in supply chains.

We have familiarized ourselves with information on the risk assessment provided by PSPC, and are monitoring related follow-action, including the development of a Policy on Ethical Procurement.

* If yes, has the government institution identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains?

- None of the above

*** Has the government institution identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?**

- None of the above

If applicable, please provide additional information on the parts of the government institution's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the government institution has taken to assess and manage that risk.

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Not applicable

2.5 Information on any measures taken to remediate any forced labour or child labour

*** Has the government institution taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

*If yes, which remediation measures has the government institution taken?

Not applicable

If applicable, please provide additional information on any measures the government institution has taken to remediate any forced labour or child labour

Not applicable

2.6 Information on any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in the institution's activities and supply chains

*** Has the government institution taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced or child labour in its activities and supply chains?**

- Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

If applicable, please provide additional information on any measures the government institution has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains

Not applicable

2.7 Information on the training provided to employees on forced labour and child labour

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*** Does the government institution currently provide training to employees on forced labour and/or child labour? (Y/N)**

No, the CRCC currently does not provide training to employees on forced labour and/or child labour.

We are aware that PSPC is currently developing awareness-raising guidance materials (including risk mitigation strategies) for suppliers, targeted towards high-risk sectors. We are monitoring the development of these materials and will leverage these resources upon their publication.

If applicable, please provide additional information on the training the government institution provides to employees on forced labour and child labour.

Not applicable

2.8 Information on how the government institution assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains

*** Does the government institution currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Yes or No)**

No

If applicable, please provide additional information on how the government institution assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains

Not applicable