



PART 1 : IDENTIFYING INFORMATION

Privy Council Office

April 1, 2023 to March 31, 2024

PART 2: REPORT CONTENTS

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

Description of the government institution's activities:

The Privy Council Office's primary activities include the purchasing of goods and services within Canada.

Additional information on the government institution's structure, activities and supply chains:

The Privy Council Office's (PCO) core responsibility is to serve the Prime Minister and Cabinet by:

- Delivering analysis, advice and support to the Prime Minister, the Deputy Prime Minister and Ministers of the Portfolio including non-partisan advice and information from across the Public Service resulting from consultations and collaborations with international and domestic sources inside and outside government;
- Acting as secretariat to the Cabinet and its committees including managing the Cabinet's decision-making system, coordinate departmental policy proposals to Cabinet, schedule and provide support services for meetings of Cabinet and Cabinet committees, advance the Government's agenda across federal departments and agencies, and provide administrative services to the Prime Minister's Office, the Deputy Prime Minister's Office, Portfolio Ministers, and Commissions of Inquiry; and
- Leading and renewing the Public Service in order to advise Government in implementing its agenda, foster healthy workplaces that promote diversity and inclusion and deliver services and results to Canadians.

During fiscal year 2023-24 PCO awarded 278 contracts for goods, including amendments valued at \$10.7 million. Of this value, 173 contracts valued at \$8.2 million, representing 76.6% of the value of PCO's goods contracts were awarded by Public Services and Procurement Canada (PSPC) or Shared Services Canada (SSC) through the use of their methods of supply 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 of human trafficking. Additionally, since



November 20, 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 our contracts for goods resulting from the use of these tools include clauses relating to forced 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.

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

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.

The Privy Council Office has used Public Service and Procurement Canada's (PSPC) including Standing Offers and Supply Arrangements, and integrated PSPC's Code of Conduct for Procurement in our purchasing activities to prevent and reduce the risk of forced labour or child labour in our procurements.

While PSPC supports government institutions in their daily operations by acting as the central purchasing agent for the Government of Canada, Privy Council Office also undertakes activities under its own procurement authority, independently of the aforementioned tools.

Privy Council Office has integrated PSPC's updated General Conditions, a set of standardized clauses, for goods contracts and PSPC's Code of Conduct for Procurement in our purchasing activities to prevent and reduce the risk of forced labour or child labour in our procurements.

During the previous fiscal year PCO purchased goods under its own procurement authority under the following Goods and Services Identification Numbers:

- ADP Software;
- Furniture;
- Video recording and reproducing equipment;
- Headsets, handsets, microphones and speakers;
- Photographic equipment and accessories
- ADPE System Configuration
- Communications Security equipment and components;
- Indoor and Outdoor electric lighting fixtures
- Office devices and accessories; and
- Bags and sacks

2.3 Information on the 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.

Pursuant to the aforementioned amendments, the PCO has integrated the Code into our procurements with a view to safeguarding federal procurement supply chains from forced labour and child labour. Contracts that the Privy Council Office awarded included the Code through the General Conditions for goods.

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 their sub-contractors to comply with Canada’s prohibition on the importation of goods produced, in whole or in part, by forced labour or compulsory labour. This includes 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 Customs Tariff on July 1, 2020. This amendment implemented a commitment in the Labour Chapter of the Canada-United States-Mexico Agreement (CUSMA) and applies to all imports, regardless of origin.

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

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.

The PCO has familiarized itself with information on the risk assessment provided by PSPC, and is monitoring related follow-action, including the development of a Policy on Ethical Procurement led by PSPC.

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?

The PCO has reviewed the commodity codes of contracts awarded under its own delegation against the areas of top ten highest risk commodity types identified in the risk analysis report shared by PSPC and identified that of the \$2.5 million awarded, \$113 thousand, or 4.5% fell in these categories. When expanded to include the additional commodity codes considered high risk based on volume, the value of contracts awarded directly by the PCO increased to \$129 thousand or 5.2% of its total contract values. PCO is exploring options to increase its utilization of methods of supply under PSPC and SSC and will be engaging with its partners on best practices for implementation going forward.

**2.5 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**

The PCO has not identified any vulnerable families who have lost income following its actions to eliminate the use of forced labour or child labour in its activities and supply chains. As such, no measures have been taken to establish grievance mechanisms or remediation measures.

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

PCO procurement officers participated in PSPC's information session on Forced Labour in Supply Chains of the Electronics Industry in March 2024, and is committed to ensuring full participation as further information and training opportunities become available. The PCO will also leverage awareness-raising guidance materials made available by PSPC (including risk mitigation strategies) for suppliers towards high-risk sectors in communicating responsibilities across the department.

2.7 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

The PCO does not currently have its own policies and procedures to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains where they fall outside of the tools established by PSPC.