

# Canada School of Public Service

**2024–25**

Annual Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*



Canada School  
of Public Service

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# Introduction

## Purpose

This report was developed as a response to the reporting obligations under the [\*Fighting Against Forced Labour and Child Labour in Supply Chains Act\*](#) (the Act).

Reporting under the Act is an annual exercise that requires the head of every government institution whose activities include producing, purchasing or distributing goods in Canada or elsewhere to publish a report on or before May 31 of each year.

The Act aims to increase industry awareness and transparency about forced labour and child labour, and to encourage responsible business practices.

The **Canada School of Public Service** (the School) is subject to reporting requirements as per section 5 of the Act and therefore must report on steps taken during its previous financial year to prevent and reduce the risk that forced labour or child labour was used at any step of the production of goods produced, purchased or distributed by the School.

## Scope

The 2024–25 report covers the steps the School took during the financial year beginning on April 1, 2024, and ending on March 31, 2025. Given that the School does not produce or generally distribute goods, the report details the steps taken to prevent and reduce the risk that forced labour or child labour was used at any step of the production of goods purchased by the School.

# Annual Report

## Structure, activities and supply chains

The **Canada School of Public Service** (the School) was created on April 1, 2004, when the legislative provisions of Part IV of the [Public Service Modernization Act](#) came into force. The School is the Government of Canada's common learning provider, offering a wide variety of courses, events, programs, and learning tools that establish a strong learning culture within the public service.

The School is an internal-facing organization serving federal public servants by providing learning products and events. The School does not produce or distribute goods or services to the public.

In 2024–25, approximately 70% of the annual value of the School's purchases of goods and services were conducted using Public Services and Procurement Canada (PSPC) Standing Offers and Supply Arrangements; approximately 20% were purchased through Shared Services Canada (SSC) procurement tools; approximately 2% were purchased through SSC directly and approximately 10% were purchased through the School's own procurement authority.

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 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 of the School's contracts for goods resulting from the use of these procurement 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](#).

## Steps to prevent and reduce risks of forced labour and child labour

To prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods purchased or distributed, the School has integrated PSPC's updated General Conditions for goods contracts and Public Services and Procurement Canada (PSPC)'s [Code of Conduct for Procurement](#) in its purchasing activities.

The School abides by the rules and regulations that govern contracting as defined in the Treasury Board [Directive on the Management of Procurement](#) and the [Government Contracts Regulations](#) for all contracting, including contracting of goods.

To additionally reduce the risk, the School uses PSPC's Standing Offers and Supply Arrangements tools whenever possible for the acquisition of goods. PSPC supports government institutions in their daily operations by acting as the central purchasing agent for the Government of Canada.

In some circumstances, the School undertakes activities under its own procurement authority, to procure specialized learning products and professional services related to the delivery of the School's mandate.

The School always exercises due diligence in the procurement process to prevent and reduce the risk that forced labour or child labour is used at any step of the supply chain. The School also makes best efforts to acquire goods and services in Canada whenever possible.

## 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 their sub-contractors to comply with Canada's prohibition on the importation of goods produced, in whole or in part, by forced or compulsory labour. This includes forced or compulsory child labour and applies to all goods, regardless of their country of origin.

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

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

## Identifying parts of your institution's activities and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage those risks

The School does not currently have departmental measures in place to assess the risk of forced labour and child labour in its supply chains. However, the majority of the School's goods are procured through Standing Offers and Supply Arrangements managed by PSPC and SSC. The School is committed to collaborating with stakeholders and federal partners to enhance its understanding and capacity to evaluate such risks across its operations and supply chains. Furthermore, the School ensures that competitive procurement processes incorporate child labour-related clauses provided by central authorities.

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 School is aware of the information on the risk assessment provided by PSPC, and is monitoring related follow-action, including the development of a PSPC Policy on Ethical Procurement.

## Measures taken to remediate any forced labour or child labour

During the previous financial reporting year, the School did not find any instance of forced labour or child labour in its activities and supply chains.

## 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

During the previous financial reporting year, the School did not find any instance of 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.

## Training provided to employees on forced labour and child labour

The School is aware that PSPC is developing awareness-raising guidance materials (including risk mitigation strategies) for suppliers, targeted towards high-risk sectors. The School will leverage these resources upon their publication.

## Assessing effectiveness in ensuring that forced labour and child labour are not being used in activities and supply chains

The School abides by the procurement policy as defined in the [Treasury Board Directive on the Management of Procurement](#) and is currently developing procedures to assess the effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.

# Key definitions

Definitions from Section 2 of the [Act](#).

- **Child labour** 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
  - (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.
- **Forced labour** means 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;
  - (b) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted at Geneva on June 28, 1930.
- **Government institution** has the same meaning as in section 3 of the *Access to Information Act*. Section 3 defines government institution as:
  - any department or ministry of state of the Government of Canada, or any body or office, listed in Schedule I; and
  - any parent Crown corporation, and any wholly-owned subsidiary of such a corporation, within the meaning of section 83 of the *Financial Administration Act*.
- **Head** has the same meaning as in section 3 of the *Access to Information Act*:
  - in the case of a department or ministry of state, the member of the Queen’s Privy Council for Canada who presides over the department or ministry, or
  - in any other case, either the person designated under subsection 3.2(2) to be the head of the institution for the purposes of this Act or, if no such person is designated, the chief executive officer of the institution, whatever their title

- **Minister** means the Minister of Public Safety and Emergency Preparedness however this role (as of January 1, 2024) is assigned to the Minister of Public Safety, Democratic Institutions and Intergovernmental Affairs.
- **Production of goods** includes the manufacturing, growing, extracting, and processing of goods.
- **Due diligence**<sup>1</sup> refers to an ongoing management process to identify, prevent, mitigate, and account for how an institution addresses actual and potential adverse human rights impacts in their operations and supply chains. There are four key parts to due diligence:

Identifying and assessing actual and potential human rights impacts (for example, screening new suppliers for risks of forced labour and child labour);

Integrating your findings across your institution and taking appropriate action to address impacts (for example, introducing internal training on forced labour and child labour, and processes for incident reporting);

Tracking your institution's performance to check whether impacts are being addressed (for example, doing an internal audit of your supplier screening); and

Publicly communicating what you are doing (for example, by publishing your annual report per the Act or publicly responding to allegations against a supplier).

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<sup>1</sup> Adapted from the due diligence definition of the Organization for Economic Co-operation and Development.

# Tools and resources

## **International Standards Resources**

United Nations Guiding Principles on Business and Human Rights

([https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf))

OECD Due Diligence Guidance for Responsible Business Conduct

(<http://mneguidelines.oecd.org/due-diligence-guidance-for-responsible-business-conduct.htm>)

Ending child labour, forced labour and human trafficking in global supply chains

(<http://www.oecd.org/fr/corruption/ending-child-labour-forced-labour-and-human-trafficking-in-global-supply-chains.htm>)

ISO 20400 – Sustainable procurement

([https://www.iso.org/files/live/sites/isoorg/files/store/en/ISO%2020400\\_Sustainable\\_procur.pdf](https://www.iso.org/files/live/sites/isoorg/files/store/en/ISO%2020400_Sustainable_procur.pdf))

ISO 26000 – Social responsibility

(<https://www.iso.org/iso-26000-social-responsibility.html>)

SA 8000 – Social accountability certification (<https://sa-intl.org/programs/sa8000/>)

Ethical Trading Initiative (ETI) Base Code

(<https://www.ethicaltrade.org/eti-base-code>)

## **Government of Canada’s Resources and Frameworks**

Code of Conduct for Procurement

(<https://www.tpsgc-pwgsc.gc.ca/app-acq/cndt-cndct/cca-ccp-eng.html>)

Canada’s Strategy on Responsible Business Conduct Abroad

<https://www.international.gc.ca/trade-commerce/rbc-cre/strategy-2022-strategie.aspx?lang=eng>

Resources and tools for responsible business conduct

([https://www.international.gc.ca/trade-commerce/rbc-cre/resources\\_tools-ressources\\_outils.aspx?lang=eng](https://www.international.gc.ca/trade-commerce/rbc-cre/resources_tools-ressources_outils.aspx?lang=eng))

National Strategy To Combat Human Trafficking 2019-2024

<https://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/2019-ntnl-strtyg-hmnn-trffc/index-en.aspx>