



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*

2024-25

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This document is available in alternative formats upon request.

Aussi disponible en français.

Introduction

This report is submitted on behalf of the Civilian Review and Complaints Commission for the RCMP (CRCC) and covers activities from April 1, 2024, to March 31, 2025, for the 2025 reporting period, required to be submitted by May 31, 2025.

Structure, activities and supply chains

Government institution's structure

Federal agency

The Civilian Review and Complaints Commission for the RCMP (CRCC) is an agency of the federal government, distinct and independent from the Royal Canadian Mounted Police (RCMP).

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.

Supply Chains

The CRCC has an office in Canada and purchases goods only 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).

For this reporting period, the types of goods that the CRCC purchased include professional services, 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.

Policies and due diligence processes in relation to forced labour and child labour

The volumes of goods purchased by the CRCC can vary significantly by each requirement and type of good. The CRCC purchases goods from inside Canada. Professional services are sourced inside Canada. The CRCC does not have information where the other goods are sourced from.

In fiscal year 2024-25, the CRCC issued 67 contracts for a combined total of contract values exceeding \$850K.

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

Steps taken by the CRCC in its 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.

Procurements Using Public Service and Procurement Canada's (PSPC) Methods of Procurement

The CRCC has integrated PSPC's Standard Contract Clauses, including PSPC's Code of Conduct for Procurement and anti-forced labour clauses in its purchasing activities. In addition, to prevent and reduce the risk of forced labour or child labour in its procurements, the CRCC has used the following list of PSPC's tools:

- Standing Offers
- Supply Arrangements
- Anti-forced labour contract clauses

PSPC has developed awareness-raising guidance materials (including risk mitigation strategies) for suppliers, targeted towards high-risk sectors. The materials are progressively becoming available on the [canada.ca](https://www.canada.ca) website.

Furthermore, the CRCC is referring our procurement personnel to these materials for awareness.

Procurements Using Shared Services Canada's (SSC) Methods of Procurement

The April 1, 2023, amendments to the Treasury Board Directive on the Management of Procurement required several contracting authorities to incorporate the Code of Conduct for Procurement ("the Code") into their procurements. In compliance with these amendments, SSC has integrated the Code into its procurements.

To prevent and reduce the risk of forced labour or child labour in our procurements, the CRCC has used the following list of SSC's tools to which the Code applies:

- Standing Offers
- Supply Arrangements
- Contracts

As a common service provider, SSC is responsible for ensuring that government departments have access to reliable, secure, and cost-effective IT infrastructure and solutions, including shared services related to networks and network security, data centres and Cloud offerings, digital communications, and IT tools.

CRCC Procurement Authority

The CRCC also undertakes activities under its own procurement authority, independently of the aforementioned SSC and PSPC tools. During the fiscal year 2024-25, the CRCC purchased goods under its own procurement authority, including but not limited to: translation, training, and language training.

The CRCC utilizes the PSPC low dollar value Request for Proposal (RFP) and contract templates, which include clauses to prevent and reduce the risk of forced labour or child labour.

Policies and due diligence processes in relation to forced labour and child labour

Policies and/or due diligence processes in place related to forced labour and/or child labour

The CRCC has embedded responsible business conduct into policies and management systems.

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 to the Government of Canada and their subcontractors, comply with all applicable laws and regulations. In addition, the Code requires vendors and their subcontractors 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 CRCC has continued to integrate the Code into its procurements, with a view to safeguarding federal procurement supply chains from forced labour and child labour. Contracts that our organization 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.

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

Identifying the parts of activities and supply chains that carry a risk of forced labour or child labour being used

The CRCC has started the process of identifying risks, but there are still gaps in its assessments.

We have familiarized ourselves with information on the risk assessment provided by PSPC, and are monitoring related follow-action, including PSPC's Policy on Ethical Procurement. [Ethical procurement - Canada.ca](https://www.canada.ca/en/procurement/ethical-procurement.html)

Aspects of activities and/or supply chains that have been identified as carrying forced labour or child labour risks

The CRCC has not identified any aspects of its activities and/or supply chains as carrying forced labour or child labour risks.

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 took note of the findings and recommendations of this risk analysis, and are monitoring related follow-action, including the implementation of the Policy on Ethical Procurement and the development of a human rights due diligence framework.

SSC is committed to ongoing risk identification, promotion and development of mitigation practices, and ongoing activities to raise awareness within its procurement community and engage with industry and strategic partners.

Forced labour or child labour risks in activities and supply chains

The CRCC has not identified forced labour or child labour risks in any activities and supply chains that were procured by the CRCC.

Measures

Measures to remediate any forced labour or child labour in activities and supply chains

The CRCC has not identified any forced labour or child labour in its activities and supply chains and therefore has not taken any remediation measures.

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 activities and supply chains

The CRCC has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and/or supply chains. As such, no measures have been taken to remediate the loss of income for the most vulnerable families.

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 activities and supply chains

The CRCC has not had to take measures to remediate the loss of income to the most vulnerable families, as there was no need to take measures to eliminate the use of forced labour or child labour in its activities and supply chains.

Training

Training provided to employees on forced labour and/or child labour

As it relates to forced labour and child labour, the CRCC does not make training mandatory for its employees but makes it voluntary.

We are aware that PSPC has developed and is currently piloting a course for procurement officers. We will leverage the course upon its publication for use across the Government of Canada.

SSC is committed to ongoing risk identification, promotion and development of mitigation practices, and ongoing activities to raise awareness within its procurement community and engage with industry and strategic partners.

Employees within the CRCC's procurement function attend all government required training or any additional training offered by other government departments such as Public Safety Canada, PSPC, and SSC.

All CRCC employees are encouraged to use the broader Government of Canada training materials available to employees (e.g. the Procurement Fundamentals course available through the Canada School of Public Service).

The CRCC subscribes to Public Safety Canada's Supply Chains Act Bulletin for ongoing updates.

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

Policies and procedures to assess effectiveness in ensuring that forced labour and child labour are not being used in activities and supply chains

The CRCC does not have policies or procedures in place to assess the effectiveness of its efforts. The majority of its procurements utilize the PSPC and SSC methods of supply, and it will continue to look to the Government of Canada for mechanisms to assess effectiveness.