



# Immigration and Refugee Board of Canada (IRB) 2025 Annual Report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act

## Submission Information

Institution: Immigration and Refugee Board of Canada (IRB)

Reporting period: April 1, 2024 – March 31, 2025

Entity Type: Government institution (federal department/agency)

## Structure, Activities and Supply Chains

The IRB is Canada's largest independent administrative tribunal, primarily contracting professional services and procuring modest quantities of goods such as office furniture and IT equipment. The IRB does not manufacture, produce, or distribute goods. Procurement is largely centralized through federal Standing Offers and Supply Arrangements, including PSPC and Shared Services Canada (SSC) procurement tools.

IRB's procurement activities include, but are not limited to, the purchase of goods in Canada. In the 2024-2025 fiscal year, the value of IRB's goods procurement was \$6,830,705.15 and the top three categories, as identified through the Goods and Services Identification Numbers (GSIN), for the highest number of contracts and the highest aggregate contract value were:

- N7030– ADP Software (30 contracts, aggregate value of \$4,171,09.83)
- N7010126 – Computers, Micro, Laptop (2 contracts, aggregate value of \$1,020,135.86)
- N6350 – Alarm, Signal, and Security Detection Systems, Miscellaneous (1 contracts, value of \$494,041.12)

At IRB, approximately 57% of the annual value of IRB's goods purchases were made through the use of PSPC tools such as Standing Offers and Supply Arrangements.

The Immigration and Refugee Board (IRB) primarily engages in Interpreter services, Designated representatives, and Transcription services through domestic suppliers and individual contractors located in Canada. These contracts are for the provision of professional services and do not involve the procurement of goods or materials.

### Steps to Prevent and Reduce Risk

The contracts for Interpreter, Designated Representative, and Transcription services are considered low-risk due to the nature of these services, which are delivered domestically, do not involve physical goods. The IRB remains committed to upholding human rights and promoting ethical procurement across all categories of contracts, including professional services such as interpretation, designated representation, and transcription. The IRB aligns its procurement practices with the [Directive on the Management of Procurement](#) and has integrated PSPC's Standard Contract Clauses including PSPC's [Code of Conduct for Procurement](#), in its purchasing activities.

Since November 2021, both Public Services and Procurement Canada (PSPC) and Shared Services Canada (SSC) have implemented anti-forced labour clauses in all goods contracts to ensure that contracts can be terminated if there is credible information that the goods were produced, in whole or in part, by forced labour or human trafficking. As of November 20, 2023, all PSPC and SSC Standing Offers and Supply Arrangements for goods that have been issued, amended, or refreshed include these anti-forced labour clauses as part of their general conditions. As a result, all Immigration and Refugee Board of Canada (IRB) contracts for goods established through these procurement instruments include clauses that set out human rights and labour rights requirements. These provisions are aligned with PSPC's Policy Notification 150 – Anti-Forced Labour Requirements.

### IRB Measures Against Forced and Child Labour in Procurement – FY 2024–25

The following measures have been implemented by the IRB to mitigate the risk of forced and child labour in procurement:

- Use of Established Procurement Instruments: IRB utilized Public Services and Procurement Canada (PSPC) Standing Offers and Supply Arrangements that include anti-forced labour clauses.
- Application of the Code of Conduct for Procurement: In effect since April 1, 2023, the Code contains explicit obligations prohibiting forced and child labour. IRB has incorporated this Code into its procurement activities.
- Monitoring of Government Guidance: IRB procurement officers regularly monitored guidance from PSPC and Public Safety Canada concerning high-risk sectors and supplier expectations, ensuring that procurement decisions are informed by the latest risk information.

- **Contractual Alignment:** The IRB integrates PSPC's Standard Contract Clauses and the Code of Conduct for Procurement in all relevant purchasing activities, in accordance with the Treasury Board's Directive on the Management of Procurement.

No credible evidence or direct risk of forced or child labour has been identified within the IRB's limited procurement scope. However, the IRB remains committed to continually strengthening its awareness and practices in this area and will continue to leverage available government tools and guidance to support ethical procurement and safeguard supply chains.

## Policies and Due Diligence

The IRB aligns with PSPC and SSC procurement policies and due diligence practices by using Government of Canada procurement instruments that include mandatory anti-forced and child labour clauses. Procurement officers apply a challenge function to ensure vendor compliance and follow relevant policy updates.

## IRB Implementation of the Code of Conduct for Procurement

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), as well as commissions established under the *Inquiries Act* and designated as departments for the purposes of the *Financial Administration Act*, to incorporate the Code of Conduct for Procurement ("the Code") into their procurement processes.

The Code requires vendors, along with their subcontractors, providing goods to the Government of Canada to comply with all applicable laws and regulations. In particular, the Code mandates compliance with Canada's prohibition on the importation of goods produced, in whole or in part, by forced or compulsory labour, including forced or compulsory child labour. This requirement applies to all goods, regardless of country of origin.

In accordance with these Treasury Board amendments, the Immigration and Refugee Board of Canada (IRB) has integrated the Code into its procurement practices to strengthen the ethical standards of its supply chains and ensure alignment with Government of Canada expectations. Contracts awarded by IRB include the Code through the applicable 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 legislative change reflects Canada's international commitment, as outlined in the Labour Chapter of the Canada-United States-Mexico Agreement (CUSMA), and applies to all imports, regardless of their origin

## **IRB Efforts to Identify and Manage Risks Related to Forced Labour and Child Labour in Procurement**

The Immigration and Refugee Board of Canada (IRB) is committed to upholding ethical procurement practices and mitigating the risk of forced labour and child labour in its supply chains. While the IRB primarily contracts for services, it leverages Government of Canada-wide procurement instruments such as Standing Offers and Supply Arrangements from PSPC and SSC, that include mandatory anti-forced labour clauses. These clauses allow for contract termination if credible information links goods to forced or child labour. Additionally, IRB procurement officers apply a challenge function to ensure vendor compliance and rely on policy updates, such as PSPC's Policy Notification 150, to guide responsible contracting practices.

### **Identification of Risk in Supply Chains**

The Immigration and Refugee Board of Canada (IRB) does not maintain large-scale international procurement supply chains; however, it remains vigilant in aligning with government-wide strategies to address the risks of forced labour and child labour. In May 2021, a risk analysis of federal procurement supply chains was completed by the Rights Lab at the University of Nottingham (UK) on behalf of Public Services and Procurement Canada (PSPC). This analysis identified goods at highest risk of exposure to human trafficking, forced labour, and child labour, and proposed key strategies for leveraging public procurement to mitigate such risks.

Although the IRB was not a direct subject of this study, it monitors and considers the findings and subsequent guidance, including the PSPC Policy on Ethical Procurement and the anticipated human rights due diligence framework to help ensure IRB's procurement activities remain aligned with ethical standards.

### **Measures Taken to Remediate Identified Risks**

The IRB continues to rely on PSPC and SSC procurement instruments, which incorporate anti-forced labour clauses and responsible business conduct requirements. These clauses allow for contract termination if credible evidence of forced or child labour is discovered. Additionally, IRB procurement officers continue to take part in mandatory training on responsible procurement practices, and the organization is exploring further integration of risk assessment tools into procurement planning. These actions are part of the IRB's broader commitment to continuously enhance due diligence and mitigate any future risks associated with unethical labour practices.

### **Addressing Potential Loss of Income to Vulnerable Families**

The IRB has not identified any loss of income to vulnerable families.

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

All IRB procurement officers are required to complete mandatory training on ethical procurement practices through the Canada School of Public Service (CSPS), including courses that align with Treasury Board Secretariat (TBS) and Public Services and Procurement Canada (PSPC) guidance. This training includes modules on the Directive on the Management of Procurement, responsible business conduct, and awareness of supply chain risks, including forced and child labour. Officers are also encouraged to participate in PSPC-led information sessions and remain current with evolving requirements, such as Policy Notification 150 on anti-forced labour clauses. These learning requirements are part of the IRB's commitment to maintaining a high standard of due diligence and upholding human rights in all procurement activities.

### Assessing Effectiveness

The IRB continues to monitor government-wide developments related to ethical procurement, including the rollout of PSPC's Policy on Ethical Procurement. IRB is committed to integrating these tools and guidance into its internal procedures as they become available to further support responsible supply chain practices and risk mitigation.