



Building a **safe** and **resilient** Canada



Public Safety Canada

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

2025

The 2025 report covers the financial year beginning on April 1, 2024, and ending on March 31, 2025. It details the steps the Department has taken to prevent and reduce the risk that forced labour or child labour is used at any step of the procurement of goods.

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Introduction

Purpose

This report has been developed in response to the reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Supply Chains Act)*.

The *Supply Chains Act* came into force on January 1, 2024, requiring certain government institutions and entities to publicly report their efforts to prevent and reduce risks of forced labour or child labour being used in their supply chains. Reports must be submitted to the Minister of Public Safety Canada (Public Safety Canada or PS) on or before May 31 of each year and include, among other things, the activities undertaken by the government institution or entity in its previous financial year.

The purpose of the legislation is to contribute to the implementation of Canada's international commitment to fight against forced labour and child labour through the imposition of reporting obligations on:

- Government institutions producing, purchasing or distributing goods in Canada or elsewhere; and
- Entities producing goods in Canada or elsewhere or importing goods produced outside Canada.

Public Safety is subject to the annual reporting requirement as a government institution¹ that produces, purchases or distributes goods and therefore must report on the steps taken during 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 Department.

¹ Under the *Supply Chains Act*, **government institution** has the same meaning as in section 3 of the [Access to Information Act](#) (ATIA). Section 3 of the ATIA defines “government institution” as “any department or ministry of state of the Government of Canada, or body or office, listed in Schedule I of the ATIA, 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](#).”

Scope

This report covers the financial year beginning on April 1, 2024, and ending on March 31, 2025 and reflects the activities of Public Safety Canada.

This report outlines the work done by PS to safeguard its supply chains from forced labour and child labour. Specifically, this report details the steps that were 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 PS.

To ensure a cohesive and integrated approach to Canada's safety and security, Public Safety Canada works closely with five partner agencies (Canada Border Services Agency, Canadian Security Intelligence Service, Correctional Service of Canada, Parole Board of Canada, Royal Canadian Mounted Police) and three review bodies (Civilian Review and Complaints Commission for the Royal Canadian Mounted Police, Office of the Correctional Investigator, and Royal Canadian Mounted Police External Review Committee), united in a single PS Portfolio. This report reflects the measures undertaken by PS only, not its Portfolio. PS Portfolio agencies and review bodies are responsible for developing and submitting their respective reports under the *Supply Chains Act*.

Authorities and application

At PS, the Director General of the Corporate Services Directorate is appointed as the Senior Designated Official for the Management of Procurement and is responsible for the implementation of procurement policy initiatives such as the reporting requirements outlined in the *Supply Chains Act*. The Corporate Services Directorate at PS is responsible for establishing contracts based on sound procurement principles, including fairness, openness and transparency to obtain best value, providing advice and recommending options to business owners on procurement strategies, developing training tools and guidance for business owners and contracting officers, and reporting and monitoring of contracts awarded.

The information provided within this report reflects PS purchasing activities under its own procurement authority as well as purchases made by PS through Public Services and Procurement Canada (PSPC) and Shared Services Canada (SSC).

PSPC is a common service provider responsible for planning and organizing the acquisition of goods for federal departments in accordance with section 6 of the [*Department of Public Works and Government Services Act*](#)². As the central purchasing entity for the Government of Canada, PSPC develops and implements contracting instruments and tools that can be used by government institutions when undertaking procurement under their own authority. These tools incorporate safeguards relating to forced labour and child labour which set out, among other things, human rights and labour rights requirements.

SSC is a common service provider responsible for planning, organizing, and acquiring related digital goods and services pursuant to section 7 of the [*Shared Services Canada Act*](#)³. SSC is responsible for operating and modernizing the Government of Canada's information technology (IT) infrastructure. Like PSPC, SSC integrates into its procurement tools measures to prevent and reduce forced labour and child labour risks.

² <https://laws-lois.justice.gc.ca/eng/acts/p-38.2/>

³ <https://laws-lois.justice.gc.ca/eng/acts/S-8.9/>

Annual report

Structure, activities and supply chains

PS was created in 2003 to ensure coordination across all federal departments and agencies responsible for national security and the safety of Canadians. PS' mandate is to keep Canadians safe from a range of risks such as natural disasters, crime and terrorism, with a mission to build a safe and resilient Canada.

PS has three essential roles in accordance with sections 4 and 5 of the [Department of Public Safety and Emergency Preparedness Act](#)⁴:

- support the Minister's responsibility for all matters related to public safety and emergency management not assigned to another federal organization;
- exercise leadership at the national level for national security and emergency preparedness; and,
- support the Minister's responsibility for the coordination of entities within the PS portfolio.

The *Supply Chains Act* names the Minister of Public Safety Canada as the minister responsible for administering the Act. As such, the Department has undertaken several implementation activities since the Act came into force, including establishing a report intake process, issuing guidance for government institutions and entities and conducting targeted engagement to increase awareness.

PS is responsible for coordinating and supporting the efforts of federal departments/agencies in collaboration with all levels of government, Indigenous communities, municipalities, industry and stakeholders. By building and implementing national policies for emergency management, national security and community safety, PS is advancing and modernizing its approach to meet the needs of the nation and its citizens.

The Department's work is supported by procurement activities. While PSPC and SSC support federal departments in their daily operations as central purchasing agents for

⁴ <https://laws-lois.justice.gc.ca/eng/acts/P-31.55/page-1.html#h-401518>

the Government of Canada, PS undertakes activities under its own procurement authority.

PS has authority to enter into a contract for goods, including all applicable taxes and amendments up to a cumulative value of \$25,000.

During the 2024 to 2025 financial year, most of PS' purchases for goods and services were under the following areas:

- Professional services
- Electronic subscriptions and publications
- Training
- Translation services
- Office furniture
- Licensing and software
- Office supplies
- IT equipment

As a whole, the Department awarded \$37,207,399 through contracts (including amendments), \$6,000,916 of which were for goods. Approximately 89% of the Department's purchases of goods were made through PSPC or using PSPC tools such as Standing Offers and Supply Arrangements, and approximately 10% of the Department's purchases of goods were made through SSC or using SSC tools such as Standing Offers and Supply Arrangements.

During the 2024-2025 fiscal year, PS purchased approximately \$48,660 in goods under its own procurement authority, representing approximately 1% of contracts for the purchase of goods. Goods purchased under PS' own procurement authority were in the following areas: furniture, office and communications equipment. All of these goods were purchased through Canadian service providers (i.e., all suppliers were Canadian-owned businesses). Moving forward, PS will continue to work with its service providers to increase the visibility of its supply chains for goods purchased under its own delegated authority.

The [Directive on the Management of Procurement](#)⁵ ensures that procurement of goods, effectively supports the delivery of programs and services to Canadians, while ensuring best value to the Crown. One of its objectives is to ensure that actions related to the management of procurement are fair, open and transparent, and meet public expectations in matters of prudence and probity. As such, under this Directive, PS is required to proactively publish information on contracts in accordance with Part 2 of the *Access to Information Act* and any associated policies, directives or guidelines, including the [Guide to the Proactive Publication of Contracts](#)⁶. Detailed information on PS' purchasing activities over \$10,000 can be found on the [Open Government](#)⁷ website.

While PS' business activities do not generally include the production and/or distribution of goods, the Department does engage in ad hoc distribution activities with respect to goods produced by third-party suppliers. Goods are distributed internally within PS and to the public on behalf of various branches (e.g., Portfolio and Communications, Deputy Minister's Office, Critical Infrastructure, Emergency Management, etc.). Goods distributed by PS include:

- Medallions, coins and pins
- Promotional items
- Clothing items
- Printed goods (on paper and paper liked products)
- Awards

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

Measures, tools and general conditions

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

⁵ <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32692>

⁶ <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32763>

⁷ <https://open.canada.ca/en>

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

PSPC

Since November 2021, PSPC has 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 that have been issued, amended or refreshed include anti-forced labour clauses as part of the general conditions for goods.

PS has also integrated PSPC's updated General Conditions for goods contracts and [PSPC's Code of Conduct for Procurement](#)⁸ into its purchasing activities under its own delegation to further prevent and reduce the risk of forced labour or child labour in its procurement supply chains.

SSC

Since November 2021, SSC has also 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. Furthermore, as of November 20, 2023, all SSC Standing Offers and Supply Arrangements that have been issued, amended, or refreshed also include anti-forced labour clauses as part of the general conditions for goods.

As such, all of PS' contracts for goods resulting from the use of PSPC and SSC's tools include PSPC and SSC's clauses relating to forced labour, which outline, among other things, human rights and labour rights requirements.

⁸ <https://www.tpsgc-pwgsc.gc.ca/app-acq/cndt-cndct/cca-ccp-eng.html>

National Strategy to Combat Human Trafficking

PS is committed to preventing human trafficking in federal procurement supply chains. In 2019, the Government of Canada launched the [National Strategy to Combat Human Trafficking](#)⁹ (National Strategy), led by PS and involving over a dozen federal departments/agencies. Under the empowerment pillar of the National Strategy, the Government continues to advance efforts to prohibit and prevent human trafficking in federal procurement supply chains and to examine long-term approaches to addressing forced labour. As part of the National Strategy, PS also delivers a national public awareness campaign to create awareness of human trafficking for the purpose of sexual exploitation and forced labour. Since August 2024, PS and federal partners have been working to inform the next iteration of the National Strategy. This work has included undertaking a series of targeted engagement sessions with domestic and international stakeholders, including individuals and groups with experience and expertise related to addressing forced labour.

Labour trafficking is a form of human trafficking that can happen in a number of different industries. It involves recruiting, moving, or holding victims to coerce them into doing any kind of work. Industries generally connected with labour trafficking include, but are not limited to, construction, agriculture, manufacturing, hospitality, food processing and restaurants. Labour traffickers can pressure victims to work by force or through threats, including mental and emotional abuse and manipulation.

Anyone can be a target of labour trafficking, however migrant workers, and newcomers to Canada looking for work, can be at higher-risk due to language barriers. People with precarious immigration status (e.g., lack of permanent residence, restrictive work permit, limited or no access to social benefits), or those working in remote areas can find it even more difficult to find support and access information about their legal rights.

The Canadian Human Trafficking Hotline is a confidential, victim-centered service that can connect callers to local service providers and/or emergency services in communities across Canada. More information about recognizing different forms of

⁹ <https://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/2019-ntnl-strtg-hmnn-trffc/index-en.aspx>

human trafficking, including how to get help, is available on [PS' Human Trafficking website](#).

Policies and due diligence processes

Code of Conduct for Procurement

Effective April 1, 2023, amendments to the [Treasury Board Directive on the Management of Procurement](#)¹⁰ 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 Department has continued to integrate the Code into PS procurements, with a view to safeguarding federal procurement supply chains from forced labour and child labour. Contracts that PS 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.”

In compliance with these amendments, SSC has integrated the Code into its procurement. To prevent and reduce the risk of forced labour or child labour in the

¹⁰ <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32692>

Department's procurements, PS 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 centers and Cloud offerings, digital communications and IT tools.

PS also applies the Code in its activities under its own procurement authority, independently of the aforementioned SSC tools.

Ethical procurement

The ethical procurement measures, which apply to PS purchasing activities, are part of broader federal efforts to implement human rights due diligence, including Canada's [responsible business conduct strategy](#)¹¹ and the National Strategy To Combat Human Trafficking 2019-2024.

The particular steps of the due diligence process, outlined in the [OECD \(Organisation for Economic Co-operation and Development\) Due Diligence Guidance for Responsible Business Conduct](#)¹², that these measures reflect, include:

- Embedding responsible business conduct into policies and management systems;
- Identifying and assessing adverse impacts in operations, supply chains and business relationships; and,
- Ceasing, preventing, or mitigating adverse impacts.

As a department of the Government of Canada, PS also seeks to protect against human rights abuses by implementing the [United Nations Guiding Principles on Business and](#)

¹¹ <https://www.international.gc.ca/trade-commerce/rbc-cre/strategy-2022-strategie.aspx?lang=eng>

¹² <https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>

[Human Rights](#)¹³. This involves ensuring that third parties with which the Department conducts business transactions, including its vendors and their sub-contractors, respect human rights in their operations and supply chains.

Existing due diligence measures focus on preventing adverse human rights impacts in supply chains, and PS recognizes that further work is needed to create mechanisms for addressing impacts where they are found to exist.

Forced labour and 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. PS officials 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.

PS used this risk assessment as a tool to examine risk exposure for those goods purchased under PSPC's authority in 2024-2025. Based on the results of the analysis conducted for goods purchased through PSPC, PS was able to determine that there are aspects of PS' purchasing activities and/or supply chains that carry a risk of forced labour or child labour, which is linked to the type of products it sources. Of the types of goods purchased in 2024-2025, office supplies supply chains were determined to be at highest risk of exposure to human trafficking, forced labour, and child labour.

In the spring of 2024, PSPC and SSC hosted a webinar on forced labour in the electronics supply chains which provided participants with the opportunity to learn about electronics industry supply chains, the various risks of forced labour they contain, and mitigation and remediation strategies for businesses. It also raised awareness of the complexity of modern supply chains and the risks of forced labour.

¹³ https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

PS continues to collaborate with PSPC, SSC and other partners to promote ethical procurement and to combat human trafficking, forced labour, and child labour. PS is monitoring PSPC's follow-up actions related to the findings of the risk assessment, including the development of a Policy on Ethical Procurement.

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.

Remediation of forced labour and child labour

The United Nations Guiding Principles on Business and Human Rights state that remediation can take many forms, including steps to ensure the harm does not reoccur, formal apologies, compensation and stopping certain activities.

While PS identified potential risks in its supply chains, including which types of goods purchased were at highest risk, PS did not identify specific instances of forced labour or child labour in its purchasing activities or supply chains. As such, no remediation measures were taken by the Department in 2024-2025.

The Department acknowledges that human rights due diligence obligations include a responsibility to provide for and co-operate in remediation measures where forced labour or child labour is found to exist. The Department is committed to following international best practices as it continues to develop capacity to identify and respond to forced labour and child labour risks.

Remediation of loss of income

PS did not identify instances of loss of income to vulnerable families resulting from efforts to eliminate forced labour and child labour in the Department's procurement supply chains, and therefore no remediation measures have been implemented.

Training

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 website.

PS has also used PSPC's awareness materials to guide suppliers and safeguard supply chains from forced labour and child labour. Furthermore, PS officials are referring procurement personnel to these materials for awareness.

PS is aware that PSPC has developed and is currently piloting a course for procurement officers. PS will leverage the course upon its publication for use across the Government of Canada. PS also supports SSC's commitment to ongoing risk identification, promotion and development of mitigation practices. PS will continue to leverage SSC's activities to raise awareness within its procurement community and engage with industry and strategic partners.

The online Procurement Fundamentals course available to all Government of Canada employees includes information on roles and responsibilities as they relate to ensuring integrity and oversight in the procurement process. In February 2025, PSPC hosted a webinar for government representatives which focused on Combatting Human Trafficking in Government Procurement Practices and featured several valuable presentations on modern slavery in procurement policy and addressing human trafficking risks in procurement.

PS also facilitates annual information sessions on reporting under the *Supply Chains Act*, which includes links to external tools and resources.

As part of efforts to [combat human trafficking](#)¹⁴ more broadly, PS continues to implement a national public awareness campaign which includes targeted materials on forced labour. A public [human trafficking campaign page](#)¹⁵ is also available for federal departments and the general public to learn about forced labour and human trafficking.

Also, under the National Strategy, PSPC is working to raise awareness of ethical procurement issues among suppliers and to support suppliers to understand their human and labour rights obligations, identify vulnerabilities in their supply chains, and develop and implement tools for ensuring compliance in their supply chains. PSPC has

¹⁴ <https://www.publicsafety.gc.ca/cnt/cntrng-crm/hmn-trffckng/actns-cmbt-hmn-trffckng-en.aspx>

¹⁵ <https://www.canada.ca/en/public-safety-canada/campaigns/human-trafficking.html>

also conducted [engagement and awareness-raising activities](#)¹⁶ with industry on ethical procurement issues.

Assessing effectiveness

PS is committed to collaborating both internally and externally and exploring approaches to assess the effectiveness of the contracting tools and prevention measures currently in place to address risks of forced and child labour in government supply chains. PS recognizes the importance of developing and implementing dedicated mechanisms, such as key performance indicators, for evaluating the effectiveness of mitigation measures adopted across federal departments, including reviewing and updating policies, guidelines, and training on forced labour and child labour risks in government procurement activities. PS will continue to promote ethical procurement and transparency in its supply chains, and strive to continuously improve and adapt its strategies to combat forced labour and child labour. Further, PS is committed to assessing the effectiveness of the *Supply Chains Act* reporting regime to ensure meaningful implementation that promotes supply chain transparency, responsible business conduct, and increased awareness of forced labour and child labour risks. Each year, the Minister of Public Safety Canada is responsible for tabling a report in both Houses of Parliament summarizing the outcomes of the previous reporting cycle. This report will also assess key findings and year-over-year progress with respect to information submitted by entities and government institutions.

The *Supply Chains Act* is a first step for Canada to safeguard human rights in its activities and supply chains. PS is committed to effective administration of the *Supply Chains Act* reporting regime and demonstrating continuous progress in Canada's fight against the use of forced labour and child labour.

¹⁶ <https://www.canada.ca/en/public-services-procurement/services/acquisitions/better-buying/reducing-barriers/protecting-human-rights-in-supply-chains.html>