

Fighting Against Forced Labour and Child Labour in Supply Chains Act

Financial reporting year: April 1, 2024, to March 31, 2025

About this report

The Fighting Against Forced Labour and Child Labour in the Supply Chains Act came into force on January 1, 2024. The Act stipulates that any government institution producing, purchasing or distributing goods in Canada or elsewhere must, on or before May 31 of each year, submit a report to the Minister of Public Safety. The report must detail the steps the government institution has 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 government institution.

Structure, activities and supply chains

The Correctional Investigator is mandated by Part III of the Corrections and Conditional Release Act as an independent Ombudsman for individuals under the custody or supervision of the Correctional Service of Canada. The primary function of the Office of the Correctional Investigator (OCI) is to investigate and bring resolution to individual complaints under its jurisdiction. The OCI as well, has a responsibility to review and make recommendations on the Correctional Service's policies and procedures associated with the areas of individual complaints to ensure that systemic areas of concern are identified and appropriately addressed.

The mission of the OCI is to ensure the fair and humane treatment of persons serving federal sentences. This is done by drawing attention to human rights obligations and holding the CSC accountable for administering federal corrections in a way that is compliant to law, policy and fair decision-making.

As a small micro-organisation, OCI relies on establishing agreements with service providers within the Government of Canada to support its corporate services, this includes contracting and procurement. For the 2024-25 Fiscal Year (FY), the service provider for contracting and procurement was Public Safety Canada (PSC).

OCI has a very small operating and maintenance (O&M) budget, the actual expenditures for the 2024-25 FY amounted to \$1.1M, approximately 90% of actual O&M spending were associated with operational travel to conduct site visits, interdepartmental settlements within the Government of Canada for corporate services, and contracts which were procured through our internal service provider, Public Safety Canada. The remaining ~10% were either acquisition card purchases or invoices paid for low dollar value products or services. In the majority of cases, those purchases were made using PSPC tools such as Standing Offers and Supply Arrangements and Shared Services Canada's Standing Offers.

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. While OCI is a separate agency (Schedule V), the corporate service provider for contracting and procurement, PSC, is listed in Schedule I.

The Government of Canada requires its vendors and their sub-contractors to operate lawfully and expects them to conduct their activities in a socially and environmentally responsible manner by, at a minimum, meeting the expectations and obligations set forth in this Code of Conduct for Procurement. Vendors and their sub-contractors will 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.

Activities and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk

OCI is a micro separate agency with fewer than 50 full-time employees, with lean operations to deliver on its single, legislated responsibility: providing independent oversight of federal corrections. While no formal process was conducted to assess and manage risks in OCI's activities and supply chain, its important to note that OCI has a very small operating and maintenance budget, 90% of total expenditures were associated with operational travel to conduct site visits, interdepartmental settlements within the Government of Canada for corporate services, and contracts which were procured through our internal service provider, PSC. However, OCI recognizes that no sectors or industries involving the production, purchasing or distribution of goods are assumed to be entirely free of forced labour and child labour risks.

Measures taken to remediate any forced labour or child labour

The OCI has not identified any instances where remediation of any forced labour or child labour was required, as no cases were identified in the 2024-25 FY.

Measures taken to remediate loss of income

The OCI has not identified any instances where remediation was required due to the loss of income to the most vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chain, as no cases were identified in the 2024-25 FY.

Training

All employees working in the finance team at OCI were asked to read the Code of Conduct for Procurement and provide confirmation upon completion. Additionally, employees are in constant discussions with PSC when guidance is required on procurement policies.

Assessment of effectiveness

While the OCI does not currently have policies and procedures in place to assess their effectiveness, it will continue using Public Services and Procurement Canada tools such as Standing Offers and Supply Arrangements and Shared Services Canada's Standing Offers for its contracting and procurement.