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Reporting obligations under the
Fighting Against Forced Labour and Child Labour
in Supply Chains Act

Report submitted by
The Canadian Institutes of Health Research (CIHR)
For Fiscal Year 23/24

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TABLE OF CONTENTS

PART 1: Identifying Information

PART 2: Report Contents

2.1 Structure, Activities and Supply Chains

2.2 Steps taken to prevent and reduce the risk of forced labour or child labour

2.3 Policies and Due Diligence Processes

2.4 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

2.5 Information on any measures taken to remediate any forced labour or child labour

2.6 Measures taken to remediate the loss of income to the most vulnerable families

2.7 Training provided to employees on forced labour and child labour

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



PART 1: IDENTIFYING INFORMATION

Name of government institution:	Canadian Institutes of Health Research (CIHR)
Financial reporting year:	April 1, 2023 to March 31, 2024
Indicate if this is a report produced by a federal Crown corporation or a subsidiary of a federal Crown corporation:	Federal Crown Corporation
Location of headquarters:	Ottawa, Ontario, Canada
The sectors/industries in which the Crown corporation operates in:	Professional, scientific and technical services
Indicate if this is a revised report:	No

PART 2: REPORT CONTENTS

2.1 Information on the government institution's structure, activities and supply chains

Which of the following accurately describes the government institution's activities?

- Purchasing goods in Canada and outside Canada.
- CIHR is a compact organization that generates roughly 5-7 million dollars worth of contracts annually.
- Approximately 45% of the annual value of our purchases is made through the use of PSPC tools such as Standing Offers and Supply Arrangements.
- Canadian suppliers are awarded a larger portion of contracts compared to International suppliers.

Provide additional information on the government institution's structure, activities and supply chain

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 for goods that have been issued, amended, or refreshed include anti-forced labour clauses.

As such, when appropriate, CIHR contracts for goods will include clauses relating to forced labour which set out, among other things, human rights and labour rights requirements.

2.2 Information on the steps taken 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.

Indicate steps taken in the 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.

Due to the recent implementation of the *Supply Chains Act*, CIHR has not been able to fully address forced labour or child labour in its activities and supply chain, nor have we fully developed and implemented action plans.



However, the Procurement Unit has taken the following steps in its purchasing activities to prevent and reduce the risk of forced labour or child labour in its procurements:

- CIHR makes an effort to maximize the use of PSPC tools, including Standing Offers and Supply Arrangements.

These tools include but are not limited to:

- *Various Supply Arrangements:* Pro Services, Learning Services, TSPS, TBIPS, THS, PASS
- *Various Standing Offers:* Training / SALSA / COTS.

- CIHR has integrated PSPC's Code of Conduct for Procurement.
- When appropriate, CIHR will integrate PSPC's updated General Conditions for goods contracts and/or PSPC's Code of Conduct for Procurement in our contracts.

During the previous fiscal year, CIHR purchased goods and services under its own procurement authority in the following areas:

- Second Language Training
- Software as a Service
- Accessibility contract (Simultaneous Interpretation/Cart Captions/ ALS)
- Other types of training

2.3 Information on the policies and due diligence processes in relation to forced labour and child labour

Does the government institution currently have policies and due diligence processes in place related to forced labour and/or child labour?

Given the recent coming-into-force of the *Supply Chains Act*, CIHR has not had the chance to execute policies, but has been able to create some due diligence processes related to forced labour and/or child labour in its procurement processes.

The Procurement Unit has created the following due diligence processes in its procurements:

- The Procurement Unit has added a section on forced and child labour to their internal checklists and contract approval documents. The aim is to remind Procurement Officers of the importance of discussing this matter with clients and suppliers.
- The Procurement Unit has made sure that the agency is well-informed and educated about forced and child labour by including a section in their Contracting and Procurement Training offered to all employees.
- The Procurement Unit has familiarized itself with information on the risk assessment provided by PSPC.



2.4 Information on the parts of its 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

Has the government institution identified the parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

Given the recent coming-into-force of the *Supply Chains Act*, CIHR has not had the chance to identify the parts of its activities and supply chains that carry a risk of forced labour or child labour being used.

However, the Procurement Unit is aware that In May 2021, a risk analysis of PSPC's supply chains was completed by the 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.

Therefore, the Procurement Unit has familiarized itself with information on the risk assessment provided by PSPC.

2.5 Information on any measures taken to remediate any forced labour or child labour

Has the government institution taken any measures to remediate any forced labour or child labour in its activities and supply chains?

Given the recent coming-into-force of the *Supply Chains Act*, CIHR has not taken any measures to remediate the use of forced labour or child labour in its activities and supply chains.

2.6 Information on any 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

Has the government institution taken any 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 its activities and supply chains?

Given the recent coming-into-force of the *Supply Chains Act*, CIHR has not taken any remediation measures, nor have we 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 supply chains.

2.7 Information on the training provided to employees on forced labour and child labour

Does the government institution currently provide training to employees on forced labour and/or child labour?



- Yes, the training is mandatory for employees making contracting or purchasing decisions and all managers that require sections 32, 34 and 33.
- CIHR is aware that PSPC is currently developing awareness-raising guidance materials (including risk mitigation strategies) for suppliers, targeted towards high-risk sectors. We are monitoring the development of these materials and will leverage these resources upon their publication.

If applicable, please provide additional information on the training the government institution provides to employees on forced labour and child labour.

The Procurement Unit will make sure that the agency is well-informed and educated about forced and child labour by including a section in its Contracting and Procurement Training offered to all employees this fiscal year.

2.8 Information on how the government institution assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains

Does the government institution currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?

Given the recent coming-into-force of the *Supply Chains Act*, CIHR has not had the chance to implement policies and procedures to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.

However, some ideas have been brought up by the Procurement Unit:

- Continuously collaborate with PSPC and adhere to the Ethical Procurement Policy and Code of Conduct.
- Continue to verify the Integrity Regime before awarding any contracts.
- Update PSPC's General Conditions for goods contracts as soon as they are released to departments.
- Mandatory training for procurement employees through the Canada School of Public Service and others once made available.
- Develop better accountability mechanisms.
- Continually adjust to evolving needs and business environments to ensure optimal contribution to these objectives.
- Inform PSPS if forced or child labour is suspected – vendors who do not respect the Law will not be able to contract with the Canadian Government
- Suppliers audited for child / forced labour