Modern slavery reporting: Key lessons from Public Safety Canada's 2024 annual report to Parliament

October 03, 2024

Canadian companies are already taking significant steps to identify and address forced and child labour risk in their supply chains. It will be important keep up this momentum as we approach the next year's mandatory reporting cycle for modern slavery and forced and child labour in supply chains.

This is the main lesson of Public Safety Canada's 2024 annual report to Parliament (Report to Parliament) on the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Modern Slavery Act).[1] The Report to Parliament provides data on the 5,795 Modern Slavery Act reports received by Public Safety Canada during the first reporting period (which ended on May 31, 2024). This data offers a window into the existing practices of Canadian organizations across a wide range of industries.

In this article, we provide a few notable observations from the Report to Parliament that may assist your organization in establishing or enhancing its practices to reduce the risk of forced and child labour in its activities and supply chain.

Preventing and reducing the risk of modern slavery

Two of the most common questions BLG advised on while assisting in the preparation of reports under the Modern Slavery Act during the first reporting period were:

- how can our organization assess our effectiveness in preventing the use of forced labour and/or child labour in our activities and supply chains; and
- are our organization's current policies and practices sufficient?

While Public Safety Canada does not evaluate whether an organization's practices are sufficient to reduce the risk of modern slavery, the Report to Parliament helpfully summarizes the methods reporting entities are already using to prevent the use of forced labour and/or child labour in their activities and supply chains.

Nearly half of reporting entities (49.84 per cent) indicated that they conducted a regular review or audit of their policies and procedures related to preventing forced labour

and/or child labour. This was the most common technique used by the private sector. A significant number of entities also reported:

- developing and implementing due diligence policies and processes for identifying, addressing, and prohibiting the use of forced labour and/or child labour in their organization's activities and supply chain (45.04 per cent);
- monitoring suppliers (38.48 per cent); and
- developing and implementing anti-forced labour and/or anti-child labour standards, codes of conduct, or compliance checklists (36.96 per cent).

While these methods of preventing or reducing forced labour and/or child labour risks represent significant diligence practices, the Report to Parliament data suggests that these measures are already common in organizations across a diverse range of sectors (such as resource extraction, transportation, manufacturing, construction, and wholesale trade), at all stages of the supply chain.

It is to be expected that organizations will need to look at their due diligence and monitoring processes progressively. The fact that a range of sophisticated practices are already common across industries suggests that Canada has benefited from know-how acquired by organizations operating in other jurisdictions, and may be on an accelerated timeline. Though the Modern Slavery Act does not require that organizations take any particular steps to combat forced labour and/or child labour, as we approach the next reporting cycle, it will be important for organizations to carefully assess where their current practices stand in relation to the market, in order to properly target their resources.

Assessing effectiveness in preventing forced and/or child labour

Another common question we advise organizations on is how they might assess the effectiveness of their existing mechanisms to prevent the use of forced labour and/or child labour in their activities and supply chains. The Report to Parliament highlights some of the key performance indicators (KPIs) reporting entities are using to assess their effectiveness. These KPIs include monitoring:

- the number of cases of forced labour and/or child labour reported and solved;
- the number of their contracts with anti-forced labour and/or anti-child labour clauses;
- the number of their employees completing relevant training;
- the age and number of hours worked per employee; and
- the number of suppliers, vendors, and/or partners that have signed a relevant code of conduct.

If your organization is in the process of developing its mechanism to assess the effectiveness of its anti-forced labour / anti-child labour policies and practices, these KPIs may serve as a helpful starting point.

Public Safety Canada's approach to enforcement

The Report to Parliament indicates that Public Safety Canada did not take any enforcement action or lay any charges against a person or entity for failing to comply with the Modern Slavery Act in the first year of reporting. Instead, Public Safety Canada prioritized raising industry awareness of reporting requirements to increase transparency regarding risk of forced and child labour, and promote meaningful action. However, there is no guarantee that this approach will continue into next year's reporting cycle, particularly given the expectation that Public Safety must report to Parliament on its enforcement efforts. Public Safety Canada may increase its enforcement activities in the next reporting cycle.

Key takeaways

The reports for the next reporting period are due on or before May 31, 2025. Conclusions from the Report to Parliament may assist your organization in enhancing its due diligence and effectiveness assessment mechanisms, and aligning itself with the current market practices in Canada. In turn, aligning your organization with these practices may contribute to successfully meeting its reporting requirements, as well as ensure your organization is not perceived by the public as falling short of your competitors' commitment to reducing the risk of modern slavery in their own activities and supply chains.

Contact us

For more information on modern slavery reporting requirements, the conclusions of Public Safety Canada's annual report, or how to strategically implement adequate policies and practices, please reach out to any of the authors or key contacts below, or any lawyer from BLG's International Trade and Investment or International Business & Human Rights groups.

[1] The Report to Parliament was tabled in Parliament on Sept. 27, 2024, and remains subject to change until approved and published on the website of Public Safety Canada.

By

Benedict S. Wray, Laura Levine, Benjamin Fuhrmann

Expertise

Capital Markets, Corporate Commercial, International Trade & Investment, International Business & Human Rights, Disputes

BLG | Canada's Law Firm

As the largest, truly full-service Canadian law firm, Borden Ladner Gervais LLP (BLG) delivers practical legal advice for domestic and international clients across more practices and industries than any Canadian firm. With over 800 lawyers, intellectual property agents and other professionals, BLG serves the legal needs of businesses and institutions across Canada and beyond – from M&A and capital markets, to disputes, financing, and trademark & patent registration.

blg.com

BLG Offices

Calgary

Centennial Place, East Tower
520 3rd Avenue S.W.
Calgary, AB, Canada
T2P 0R3

T 403.232.9500
F 403.266.1395

Ottawa

World Exchange Plaza
100 Queen Street
Ottawa, ON, Canada
K1P 1J9

T 613.237.5160
F 613.230.8842

Vancouver

1200 Waterfront Centre
200 Burrard Street
Vancouver, BC, Canada
V7X 1T2

T 604.687.5744
F 604.687.1415

Montréal

1000 De La Gauchetière Street West
Suite 900
Montréal, QC, Canada
H3B 5H4

T 514.954.2555
F 514.879.9015

Toronto

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada
M5H 4E3

T 416.367.6000
F 416.367.6749

The information contained herein is of a general nature and is not intended to constitute legal advice, a complete statement of the law, or an opinion on any subject. No one should act upon it or refrain from acting without a thorough examination of the law after the facts of a specific situation are considered. You are urged to consult your legal adviser in cases of specific questions or concerns. BLG does not warrant or guarantee the accuracy, currency or completeness of this publication. No part of this publication may be reproduced without prior written permission of Borden Ladner Gervais LLP. If this publication was sent to you by BLG and you do not wish to receive further publications from BLG, you may ask to remove your contact information from our mailing lists by emailing unsubscribe@blg.com or manage your subscription preferences at blg.com/MyPreferences. If you feel you have received this message in error please contact communications@blg.com. BLG's privacy policy for publications may be found at blg.com/en/privacy.

© 2026 Borden Ladner Gervais LLP. Borden Ladner Gervais LLP is an Ontario Limited Liability Partnership.