



Office of the
Commissioner of
Official Languages

Commissariat
aux langues
officielles

AUDIT OF SERVICE DELIVERY IN ENGLISH AND FRENCH TO AIR CANADA PASSENGERS

FINAL REPORT
SEPTEMBER 2011

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LANGUES OFFICIELLES

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Cat. No.: SF31-109/2011
ISBN: 978-1-100-53756-6

HIGHLIGHTS

Air Canada is the largest air carrier in Canada, and the largest provider of passenger services in the Canadian market, the Canada–United States transborder market, and the international market to and from Canada. Air Canada operates an average of 617 flights per day, carries almost 24 million passengers annually, and provides direct passenger services to 105 destinations in 42 countries on 5 continents. Air Canada's main hubs are Montréal, Toronto, Calgary and Vancouver. In almost every case where there is a lack of service in an official language at Air Canada, French is the language involved. Almost half the agents on flights are bilingual, while in the airports, only one agent out of four is bilingual.

The Office of the Commissioner of Official Languages conducted an audit of Air Canada from April 2010 to January 2011 to evaluate the services provided in both official languages on board flights on designated bilingual routes. We also examined services provided in airports where Air Canada has language obligations, and services provided by its call centres.

Canadians expect Air Canada to consider our two official languages as a valued asset as well as a business opportunity and an obligation. The results of the audit reveal that a wind of change is required for this to happen. This institution must show solid leadership and make a sincere commitment to linguistic duality at all hierarchical levels. We are convinced that implementing all the proposed recommendations will be a step in the right direction.

The audit had four objectives: to determine whether Air Canada's senior management had made a commitment to offer services of equal quality to passengers in both official languages; to determine whether Air Canada actively offered and provided services in both official languages in airports where it has language obligations and on flights on designated bilingual routes; to determine whether it consulted representatives of official language minority communities in the various regions to identify their bilingual service needs; and, finally, to determine whether the institution effectively monitored the quality of its service delivery performance in the language of the official language minority community, both in the air and on the ground.

The audit revealed that Air Canada has a structure in place to manage the various parts of the *Official Languages Act* and that it has appointed an official languages champion. It has an official languages policy and action plan that must be updated as they do not take into account all the components of Part IV of the Act, nor the air carrier's realities. Air Canada has a number of means at its disposal for communicating language obligations to its personnel. It has produced a video on the active offer of bilingual services. Unfortunately, the audit shows significant shortcomings in the knowledge managers and agents have of Air Canada's obligations with respect to the active offer and delivery of bilingual services. There are also language training and maintenance of skill courses that Air Canada and Jazz employees can take; however, these appear to be insufficient to meet the needs of the carrier.

The audit also led us to conclude that Air Canada must adopt a management approach that further incorporates official languages into its activities in order to offer all of its passengers bilingual services of equal quality by taking a proactive approach. Air Canada does not have an official languages accountability framework that sets forth guidelines for the effective management of official languages issues as well as the roles and responsibilities of the official languages champion, senior executives and all managers and agents who are responsible, directly or indirectly, for the active offer and delivery of bilingual services in the air and on the ground. Likewise, Air Canada has no employee performance evaluation mechanisms that take into account the institution's obligations under Part IV of the *Official Languages Act*. Moreover, Air Canada does not have a network of official languages coordinators, who could play an important role within the company. Senior executives and managers must play a key role in the implementation of the *Official Languages Act*.

Generally speaking, the planning for the provision of bilingual services pertaining to Air Canada's activities in its various service areas is not always straightforward or appropriate. A comprehensive examination is required so that the necessary corrective measures can be identified and implemented. Weaknesses were also noted with respect to the bilingual capacity of the agents in a number of airports. It should be noted that we congratulate Air Canada for the efforts it has made at Montréal's Pierre Elliott Trudeau International Airport, where all of its agents are bilingual.

During the audit, we met with union representatives for flight attendants and airport ground personnel, who are important allies in official languages issues. They all demonstrated their support for Air Canada's obligations to communicate with the public in the language of the official language minority community. We also examined whether Air Canada had consulted the official language minority communities in an organized and structured manner. These consultations had not taken place.

Lastly, we evaluated the monitoring mechanisms that exist for air and ground services, and conclude that work remains to be done to achieve the desired results. There is also a lack of monitoring of the bilingual services provided by Jazz, even though there is a language clause in its contract. Air Canada should make a firmer commitment in this regard.

In light of these observations, the Commissioner of Official Languages has made 12 recommendations to help Air Canada improve its service delivery to passengers in both official languages. These recommendations are listed in Appendix B.

We are satisfied with the measures and timelines proposed in Air Canada's action plan for 11 of our 12 recommendations. The action plan is reproduced in Appendix C. We are only partially satisfied with Air Canada's response to Recommendation 11, however, even though we had made changes to the recommendation to respond to the institution's concerns. We maintain that full implementation of all recommendations is necessary for Air Canada to be able to meet its obligations under the *Official Languages Act* regarding communications with and delivery of bilingual services to the public.

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INTRODUCTION

Air Canada is the largest air carrier in Canada, and the largest provider of passenger services in the Canadian market, the Canada–United States transborder market, and the international market to and from Canada. Despite constant changes, it remains a symbol for Canadians. As the only air carrier in Canada subject to the *Official Languages Act*, Air Canada is responsible for promoting linguistic duality, and if this is considered a corporate value by all employees, it can become an important asset in the company's service to Canadians. Because of Air Canada's size and its significant responsibilities to serve Canadians in the official language of their choice, it is essential that its delivery of services in both official languages be monitored.

Air Canada reports that it conducts, on average, 617 regular flights per day, transports almost 24 million passengers annually, and provides direct passenger services to 105 destinations in 42 countries on 5 continents. Air Canada's main hubs are Montréal, Toronto, Calgary and Vancouver.

Air Canada operates a worldwide network in cooperation with its international air partners. It is a founding member of the Star Alliance network, the largest air alliance in the world. The Star Alliance network has 26 member air carriers, thus allowing Air Canada to offer its clientele service to 1,077 destinations in 175 countries, and provide the members of its loyalty program with the same advantages at all of the other carriers in the network and access to their airport lounges.

Air Canada earns a portion of its revenue through its air freight services, Air Canada Cargo, and its tour operations provided by its exclusively owned subsidiary, Air Canada Vacations.

Air Canada has about 26,000 employees, including 6,000 flight attendants, 3,000 customer sales and service agents in airports, and 650 customer sales and service agents in call centres. Air Canada operates in the following designated bilingual airports: St. John's, Halifax, Montréal, Ottawa, Toronto, Winnipeg, Edmonton, Calgary and Vancouver. Its nine call centres are located in Saint John, Montréal, Toronto, Winnipeg, Calgary, Tampa, Mexico City, London and Frankfurt. The General Manager, Linguistic Affairs Department, who is responsible for implementing Part IV of the *Official Languages Act*, reports to the Director, Corporate Human Resources, who in turn reports to the Senior Director, Human Resources. The Senior Director reports to the Senior Vice-President, Employee Relations, who in turn reports to the President and CEO.

Air Canada must ensure that the public can communicate with it in English or in French at its headquarters, as well as in all airports or on board all flights where there is a significant demand in either official language, both in Canada and abroad.

Audit objectives and legislative framework

Although Air Canada has a number of responsibilities under the *Official Languages Act*, the audit focused on Part IV of the Act, which guarantees the public the right to communicate with and receive services from federal institutions in either official language. The purpose of the Act is to ensure respect for English and French as the official languages of Canada, the equality of their status, and equal rights and privileges regarding their use in all federal institutions. Air Canada is subject to the *Official Languages Act* and the *Official Languages (Communications with and Services to the Public) Regulations*.

Before being privatized in 1988, Air Canada had been developed using public funding and was a Crown corporation with language obligations under the *Official Languages Act* of 1969, and then under the *Official Languages Act* of 1988. After the privatization of Air Canada, Parliament wanted to ensure that the company would retain its language obligations and, in 1988, adopted section 10 of the *Air Canada Public Participation Act*, which expressly states that Air Canada is subject to the *Official Languages Act* and that it must also monitor its subsidiaries to ensure that they respect Part IV of the *Official Languages Act* regarding air and related services.

Consequently, Air Canada is subject to, among other points, sections 23 and 25 of Part IV of the *Official Languages Act*, which state:

“23. (1) For greater certainty, every federal institution that provides services or makes them available to the travelling public has the duty to ensure that any member of the travelling public can communicate with and obtain those services in either official language from any office or facility of the institution in Canada or elsewhere where there is significant demand for those services in that language. (. . .)

25. Every federal institution has the duty to ensure that, where services are provided or made available by another person or organization on its behalf, any member of the public in Canada or elsewhere can communicate with and obtain those services from that person or organization in either official language in any case where those services, if provided by the institution, would be required under this Part to be provided in either official language.”

As Jazz works for Air Canada through a service contract, it must respect the same requirements that apply to Air Canada regarding service delivery and communications with the public.

With regard to services to the public, Air Canada has language obligations when there is significant demand (Part IV of the Act). Moreover, Air Canada has language obligations when communicating passenger safety information on board its aircraft. The *Official Languages Regulations* detail the scope of these obligations. We would also like to state that public health and safety regulations require all carriers, including Air Canada, to communicate with the public and provide health and safety services in English and French.

Services must be offered in both official languages on board flights where there is a significant demand and on board all flights on routes that are designated bilingual. A route is designated bilingual when: 1) it starts, has an intermediate stop or finishes at an airport in the National Capital Region, the census metropolitan area of Montréal or the City of Moncton; 2) it starts and finishes in a province where the official language minority community represents at least 5% of the population (the provinces of Ontario, Quebec and New Brunswick are, therefore, designated bilingual); 3) it connects two bilingual regions.

Moreover, services on the ground must be offered in both official languages in airports that receive at least one million passengers per year or if the demand for services in the language of the official language minority community is at least 5%.

The airports with more than one million passengers per year are St. John's, Halifax, Québec City, Montréal, Ottawa, Toronto, Winnipeg, Saskatoon, Edmonton, Calgary, Kelowna, Vancouver and Victoria.

The airports served by Jazz where the demand in the language of the official language minority community over a one-year period is at least 5% are Îles-de-la-Madeleine, Moncton, Sept-Îles, Fredericton, Québec City, Val-d'Or, Rouyn-Noranda, North Bay, Sudbury, Timmins, Windsor, Sault Ste. Marie and Victoria.

Methodology

The audit was carried out in compliance with the standards set forth in the Office of the Commissioner of Official Languages' external audit policy. The results of the audit are specific to this audit and do not preclude the possibility that there could exist other problems or systemic issues within the institution. The audit focused exclusively on Air Canada. In terms of Jazz, only activities relating to Air Canada's language obligations included in its contract with Jazz were examined—in particular, language training for front-line agents at Jazz, and Air Canada's monitoring mechanisms designed to ensure that Jazz provides services of equal quality in English and French.

The audit had four objectives. The first was to determine whether senior management at Air Canada had made a commitment to ensure that Air Canada's services are of equal quality in both official languages, and identify any services Air Canada would need to improve, establishing specific measures that the company must adopt to comply with the *Official Languages Act*, given the recurring problems that are giving rise to such a high number of complaints. Air Canada is one of the three institutions about which the Office of the Commissioner of Official Languages receives the most complaints each year regarding service delivery to the public (between 2005 and 2009, Air Canada was top of the list for the number of complaints received annually). Between January 1, 2005, and December 31, 2010, 67% of the complaints regarding Air Canada concerned bilingual services offered in airports; only 27% of Air Canada's agents working in airports are bilingual. During the same period, the issue of bilingual inflight services accounted for 33% of the complaints received; 45% of the company's flight attendants are bilingual.

The second objective was to examine the practices concerning active offer and service delivery in both official languages inflight, on Air Canada's Web site, and in airports, particularly at customer service counters, check-in counters, ticket counters, baggage check-in counters, and boarding gates; in live announcements and announcements made via an automated system; at self-service kiosks; and in Maple Leaf lounges. Moreover, we verified whether the call centres offered services in both official languages. Lastly, we met with Air Canada employee union representatives to discuss the issues within Air Canada regarding service delivery in both official languages and how the unions could play a role in helping Air Canada better meet its obligations under the *Official Languages Act*.

It is important to note that the audit also included consultations with senior executives, managers, service directors, lead customer sales and service agents, and front-line agents in the air and on the ground, seeking their impressions regarding services of equal quality in English and in French, soliciting ideas that could improve bilingual services, and identifying problems anticipated by Air Canada personnel with respect to potential solutions.

The third objective was to determine whether Air Canada had consulted the official language minority communities in a structured and organized manner to determine their particular needs regarding passenger services.

The final objective was to verify existing monitoring mechanisms to ensure that Air Canada undertakes every possible means to find durable solutions to problematic situations.

In April 2010, we began the audit at Air Canada headquarters. Between October and December 2010, we visited seven airports (St. John's, Halifax, Montréal, Ottawa, Toronto, Winnipeg and Vancouver) and two call centres.

We carried out almost 150 interviews with Air Canada personnel, including the official languages champion, senior executives, managers, service directors, flight attendants, lead agents, and customer sales and service agents. We

also met with union representatives for flight attendants belonging to the Canadian Union of Public Employees and those for customer sales and service agents belonging to the National Automobile, Aerospace, Transportation and General Workers Union of Canada. We also felt it wise to interview someone responsible for the second-language testing of prospective and current employees as well as the manager responsible for language testing. At Jazz, we interviewed the person responsible for the language training program. Lastly, we interviewed representatives from official language minority communities in most of the provinces.

Our observations and recommendations are also based on an analysis of the key documents that were provided by the institution, such as the *Air Canada Language Policy and Guidelines*, Air Canada's official languages action plan, intranet sites (including those for flight attendants and customer sales and service agents), presentations and training on Air Canada's obligations pertaining to bilingual service delivery, information bulletins, periodicals, a video and various statistical data.

On January 12, 2011, we held a debriefing session with Air Canada's senior management concerning the audit.

We are very grateful for the excellent cooperation of all personnel during the audit, and particularly that of the significant number of flight attendants and customer sales and service agents who made themselves available to meet us without advance notice, despite their busy schedules.

ANALYSIS OF FINDINGS AND RECOMMENDATIONS

OBJECTIVE 1

ENSURE THAT AIR CANADA SENIOR MANAGEMENT IS COMMITTED TO IMPLEMENTING PART IV OF THE *OFFICIAL LANGUAGES ACT*, THEREBY PROVIDING AIR CANADA PASSENGERS WITH SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES.

a) Verify that Air Canada has an official languages accountability framework.

Air Canada does not have an official languages accountability framework. This framework would, generally speaking, set forth the guiding principles for the effective management of official languages issues as well as the roles and responsibilities of the official languages champion, senior executives, managers, team leaders (service directors and lead agents) and front-line personnel in the air and on the ground.

Air Canada has an official languages program that is managed by the General Manager, Linguistic Affairs Department. She is responsible for the implementation of the action plan on official languages, training associated with Air Canada's official languages obligations, second-language training for Air Canada and Jazz employees, the coordination of language tests, and translation services. There is also a complaint management process pertaining to official languages in which complaints are dealt with in cooperation with the managers working in the various airports.

Although Air Canada executives have stated that official languages are a fundamental value within the company, the results of the audit show that executives need to show leadership and more effectively incorporate official languages into their activities. Moreover, we observed that, generally speaking, the managers are not well enough informed about official languages and are not given enough directives to meet Air Canada's language obligations. In this area, we believe that the managers do not always receive the necessary support from the vice-presidents to enable them to develop strategies to implement Part IV of the *Official Languages Act* within the organization and the airports. The Senior Vice-President, Employee Relations, is responsible for the application of Air Canada's directive regarding implementation of the *Official Languages Act*.

Furthermore, we noted a lack of internal mechanisms conducive to discussions on all of the official languages objectives. It appears that the subject of official languages is not a standing item on the Board of Directors' agenda. We were informed that the Board does not keep minutes of its meetings.

None of the personnel we interviewed knew that Air Canada had appointed an official languages champion. During our interview, the champion told us that her role was to promote official languages at the senior executive level. Therein lies the importance of ensuring her visibility and describing her role and responsibilities in an accountability framework.

Official languages issues are still present in Air Canada's organizational culture, and the company must do more in terms of accountability and raising awareness among its personnel. Air Canada must ensure that its front-line agents fully assume their responsibilities by providing customers with bilingual services of equal quality.

We would like to note that it is rare for a company of this size with recurring official languages problems to designate a single employee responsible for promoting and monitoring all activities pertaining to official languages. At the time of our audit, Air Canada did not have a network of official languages coordinators, and yet its *Air Canada Language Policy and Guidelines* states that "each branch nominates an official language coordinator, responsible to the branch head, to oversee implementing the *Corporate Language Policy* and be the principle contact with Linguistic Affairs." We believe that establishing such a network in airports where Air Canada has language obligations would have several advantages in terms of promoting, raising awareness of, and monitoring the active offer of bilingual services and in terms of monitoring the services provided in English and French. The simple fact of monitoring these activities more closely would give Air Canada the opportunity to improve its official languages performance, restore its image by reducing the number of complaints, and further comply with the *Official Languages Act*. This new approach would allow all airport personnel to refer to an on-site resource person should particular situations arise. For their part, through regular meetings by teleconference (and occasionally in person), coordinators would be able to discuss best practices and issues, with the goal of refining their approach in language matters.

During our visits to the airports, we met with flight attendants and customer sales and service agents, in permanent positions or on assignment, who expressed great enthusiasm and shared their convictions regarding bilingual service delivery. Air Canada would do well to make these employees the coordinators. An interest call could be launched to seek volunteers among employees. We are confident that agents with the desired profile are already in the workplace and that very little in the way of financial resources would be necessary to establish such a network. Currently there are no designated employees on-site for promoting and monitoring all activities from an official languages perspective.

We would also like to mention that there is no strategic plan at Air Canada with a component on official languages. However, the major priorities cited in the company's 2009 annual report concern expanding international operations, increasing revenue, achieving significant cost savings throughout Air Canada via its Cost Transformation Program, enhancing customer service, further developing and promoting premium class travel, and fostering culture change at Air Canada. We encourage Air Canada to incorporate its official languages requirements into its customer service activities.

RECOMMENDATION 1

The Commissioner of Official Languages recommends that Air Canada develop and implement an accountability framework for official languages in order to clearly define the roles and responsibilities of its personnel with respect to the various requirements of the *Official Languages Act*, particularly those relating to bilingual service delivery. This framework should also include coordination mechanisms and determine how managers will be held accountable. It should be communicated to all personnel.

RECOMMENDATION 2

The Commissioner of Official Languages recommends that Air Canada ensure it has the necessary human and financial resources to implement Part IV of the *Official Languages Act*.

b) Verify that Air Canada's official languages action plan allows for the effective implementation of Part IV of the Official Languages Act with regard to services offered in the air and on the ground, in person, by telephone, in writing and via automated and electronic systems.

The 2001–2010 Air Canada official languages action plan is not a typical action plan. It was created to meet specific needs when 4,000 unilingual Canadian Airlines International employees joined Air Canada. Its objective was to increase language training in order to bring the level of bilingualism of the new employees up to Air Canada levels. The plan's longevity was to ensure that language training was provided to as many employees as possible. Official languages action plans are normally of a maximum duration of three years and are revised each year. They must reflect the realities of the institution, take its structure into account, and include all of the measures necessary for the effective implementation of Part IV of the *Official Languages Act*. None of the Air Canada staff we met with, including managers, knew anything about the Air Canada official languages action plan.

"Even if we don't know [what] the action plan [is], we must respect official languages."

– Manager

Air Canada told us that it was waiting for the recommendations resulting from our audit before establishing a new official languages action plan. We must hope that this new plan will take into account all of the components of Part IV of the *Official Languages Act* and the specific needs of official language minority communities with regard to bilingual service delivery. It is essential that Air Canada establish and implement a precise, prescriptive action plan that includes concrete measures that target the desired results, i.e., the active offer and delivery of services in both official languages.

RECOMMENDATION 3

The Commissioner of Official Languages recommends that Air Canada establish a new action plan on the effective implementation of Part IV and the other parts of the *Official Languages Act* in order to ensure services of equal quality in English and French in its various sectors of activity. This plan should include the visual active offer of bilingual services as well as the active offer of bilingual services in the air, on the ground and in call centres. The plan should include specific measures accompanied by deadlines, performance indicators and an accountability mechanism. For their part, Air Canada directors/managers in airports could also draw up an official languages action plan, presenting specific measures reflecting their particular situations in matters of bilingual service delivery. These plans, which could be based on Air Canada's plan, should be communicated to all personnel.

c) Verify that Air Canada has an official languages policy (or guidelines) that takes into account all of the components relating to services to the public, that is approved by senior management and that is in compliance with the Official Languages Act and its regulations.

In 2003, Air Canada revised its *Air Canada Language Policy and Guidelines*, which presents an overview of official languages in terms of “the principle of equality of both official languages, within the spirit and intent of the *Official Languages Act* of Canada, according to the company's good citizenship responsibilities.” It briefly describes the role and responsibilities of the Linguistic Affairs Department and describes Parts IV, V and VI of the Act. It also focuses on the allocation of positions, appointments (“As the national airline of Canada, in Canada, Air Canada will consider only bilingual candidates (English and French with a Level 3 and 4) when hiring new public contact agents.”), language training, training (including professional training) and the fact that work instruments, software and computer tools must be provided to personnel in English and French. There is a list of services that must also be provided in both official languages and in the language of Air Canada's clientele as well as a reference stating that Air Canada's intranet sites and publications must be updated simultaneously in English and French.

For language of service, the *Air Canada Language Policy and Guidelines* states that:

- inflight services must be offered in both official languages and provided in the official language of the customer's choice;
- services at reservation locations, ticket counters, check-in counters, and departure gates and other related customer services must be offered in both official languages.

Lastly, the policy states that “[e]mployees who don't speak the official language of the customer are to say ‘un moment s'il vous plaît’ and then obtain the services of a bilingual colleague. **Under no circumstances should the employee encourage the customer to switch to the employee's language.**”

In light of the results of the interviews that we conducted with managers at different levels, service directors, flight attendants, lead agents, and customer sales and service agents, it is astonishing to note that the vast majority of these employees did not know that this policy existed. Some employees mentioned that the policy should be on Air Canada's portal (ACAeronet); however, this is already the case. It should be noted that knowledge of official languages requirements among these employees was limited to the fact that Air Canada services should be offered to the public in both official languages.

“I think that the directive is on Aeronet, but I haven't looked for it on the intranet.”

– Manager

The *Air Canada Language Policy and Guidelines* should be revised to take into account Air Canada's new structure and should also include all the components in Part IV of the *Official Languages Act*. In particular, the policy should include detailed information on the active offer of bilingual services, including the standards for visual active offer, given the significant gaps noted in this regard, which are presented later in this report. Moreover, we believe that the policy could be revised to clarify its scope by specifying “official languages,” as Air Canada also hires employees to offer services in a number of languages other than French. Obviously, the members of senior management will have to approve the new policy.

When developing its new policy and including official languages, Air Canada should take into account jurisprudence, past decisions and recommendations regarding service delivery in English and in French, and the particular needs of its customers from official language minority communities. Finally, Air Canada must effectively communicate its new policy to all of its personnel.

RECOMMENDATION 4

The Commissioner of Official Languages recommends that Air Canada develop a new directive or policy that takes into account its structure and its realities, and that covers all of its responsibilities as set forth under Part IV of the *Official Languages Act*. This policy should be effectively communicated to all of its personnel, and reminders should be sent regularly to ensure its implementation.

d) Verify that Air Canada is effective in informing all personnel assigned to inflight and ground service delivery, either in person or by telephone, and personnel responsible for automated and electronic systems of the requirements regarding service delivery in both official languages.

Air Canada has many ways of communicating its official languages obligations and other information to its personnel. The institution has three types of intranet Web sites. The first is the corporate site, ACAeronet, where all of the activities regarding official languages are listed, including training schedules and procedures. The content of the two other sites, ePub for flight attendants, and ACpedia for customer sales and service agents, includes all of Air Canada's procedures relating to its multiple obligations in the area of aviation and other functions. Our interviews revealed that the two latter sites are very well known and often consulted by agents.

Air Canada also uses publications and bulletins to provide its agents with information on official languages. During our examination, we noted that the *Globe* publication distributed to agents electronically and in print form included some articles on official languages at the time of the Vancouver 2010 Olympic and Paralympic Winter Games. An article was also published in the *Globe* during the audit. However, very little information on official languages had been published previously. In larger airports, information bulletins are given to agents who provide services on the ground. These

bulletins, for example, *Heads Up in the Hub* (published at Toronto's Pearson International Airport) and *Above the Wing*, sometimes include reminders about Air Canada's official languages requirements. The daily bulletin *Le Point*, which addresses current affairs, is sent electronically to employees who subscribe to it. In terms of information distributed in smaller airports, agents receive information by e-mail; however, it rarely concerns official languages requirements. Agents who work in call centres also receive information by e-mail. In addition, the Linguistic Affairs Department has published a handout entitled *Welcome/Bienvenue – Official Languages at Air Canada*, which briefly describes Air Canada's language obligations under Part IV of the *Official Languages Act*.

“During the Olympic Games, the focus was on official languages and we were given the message to promote French.”

– Flight attendant

Although all these means of communication exist, we must say that very little information regarding Air Canada's obligations regarding the active offer and delivery of bilingual services has been communicated to front-line agents, except during special events such as the Vancouver 2010 Olympic and Paralympic Winter Games. On that occasion, Air Canada produced the “Hello/Bonjour” video, which is very relevant and merits being shown regularly in all of the airports. In order to inform all of its personnel across Canada, Air Canada could plan intensive awareness campaigns. To achieve the desired results, we believe that Air Canada should do more than convey information on its obligations solely via its publications, as a number of employees told us that they rarely read them. As it did during its preparations for the Olympic Games, with very positive results, Air Canada must carry out awareness campaigns to achieve concrete results and thus comply with the *Official Languages Act*.

RECOMMENDATION 5

The Commissioner of Official Languages recommends that Air Canada take concrete and effective measures to raise awareness among managers, service directors, flight attendants, lead agents, and customer sales and service agents of the company's responsibilities pertaining to the active offer and delivery of bilingual services under Part IV of the *Official Languages Act*.

e) Verify that Air Canada's training modules, which are given to both its own employees and those of Jazz, include Air Canada's obligations and employees' responsibilities pertaining to official languages.

Air Canada employees

Training on Air Canada's obligations pertaining to the active offer and delivery of bilingual services

As described above, during the Vancouver 2010 Olympic and Paralympic Winter Games, Air Canada gave all its agents at Vancouver International Airport a mandatory training course on the active offer of bilingual services called "Hello/Bonjour" and a workshop called "Un moment s'il vous plaît." We salute Air Canada for this initiative as we have heard only good things about it. We strongly encourage Air Canada to use this strategy whenever it begins an awareness campaign, and to regularly issue reminders.

With the exception of employees working at Vancouver International Airport, a few employees at Toronto's Pearson International Airport, and flight attendants hired during the past year who remembered having seen the video on the active offer of bilingual services, all other agents that we met with stated that they had not received any training on Air Canada's official languages obligations. Air Canada now has the necessary material to provide mandatory training on the active offer of bilingual services and on Air Canada's language obligations to all front-line personnel.

Language training for Air Canada employees

Although Air Canada stated that language training could help increase the number of bilingual agents, we noted that this approach is not used often enough.

The following tables present the data on language training provided in 2009–2010 to flight attendants and customer sales and service agents working in the airports that we visited during the audit.

Number of Participants in St. John's

2009	2010	Description
–	4	Maintenance of skills—Air Canada

Number of Participants in Halifax

2009	2010	Description
–	25	Intensive course—Jazz
47	37	Maintenance of skills—Air Canada

Number of Participants in Montréal

2009	2010	Description
20	–	Baggage workshop for qualified persons
–	68	Francization
–	5	Maintenance of skills for beginners
4	2	Maintenance of skills—Air Canada
27	14	Maintenance of skills—Jazz
–	5	"Un moment s'il vous plaît" workshop— Inflight service
–	111	Announcements workshop—Inflight service

Number of Participants in Ottawa

2009	2010	Description
4	–	Announcements workshop—Airport
4	–	Maintenance of skills—Air Canada
8	3	"Un moment s'il vous plaît" workshop— Airport

Number of Participants in Winnipeg

2009	2010	Description
1	–	Announcements workshop—Airport
–	5	Maintenance of skills—Air Canada
33	82	Maintenance of skills—Call centre
19	–	"Un moment s'il vous plaît" workshop— Airport

Number of Participants in Toronto

2009	2010	Description
–	83	Levels 1 to 6, accelerated learning—Jazz
15	32	Levels 7 to 12, accelerated learning—Jazz
17	7	Announcements workshop—Airport
56	48	Intensive course—Jazz
104	–	Intensive course—Inflight service
465	265	Maintenance of skills—Air Canada
27	18	Maintenance of skills—Call centre
164	236	Maintenance of skills—Jazz
4	17	“Un moment s’il vous plaît” workshop—Inflight service
–	12	Announcements workshop—Initial training, flight attendants
2	4	Announcements workshop—Inflight service
14	177	“Un moment s’il vous plaît” workshop—Airport

Number of Participants in Vancouver

2009	2010	Description
31	54	Levels 1 to 6, accelerated learning—Jazz
14	49	Levels 7 to 12, accelerated learning—Jazz
6	–	Announcements workshop—Airport
32	–	“Un moment s’il vous plaît” workshop—Baggage agents
32	–	Intensive course—Airport
19	28	Intensive course—Jazz
40	–	Intensive course—Inflight service
189	176	Maintenance of skills—Air Canada
66	68	Maintenance of skills—Jazz
–	24	Announcements workshop—Initial training, flight attendants
3	–	Announcements workshop—Inflight service
6	4	“Un moment s’il vous plaît” workshop—Inflight service
268	–	“Un moment s’il vous plaît” workshop—Airport

N.B. Data provided by Air Canada

The comments we received during our visits showed that access to training was very restricted and difficult for the following reasons. The agents made it very clear that there was a certain degree of reluctance on the part of management to approve training courses unless they were taken outside work hours, because of operational requirements. In one specific case, in a small airport, the two-day training course on skills maintenance was reduced to a single day so as not to interfere with operational requirements. With regard to skills maintenance, a two-day training course is offered monthly. Requests from agents invited to be tested are dealt with as a priority. A flight attendant who took a five-day training course during her time off indicated that this approach made the organization of work difficult. Agents receive a salary while they are in training, but when accessing training outside the workplace, they are required to pay for their accommodation expenses.

All of the agents we met with who had received training for skills maintenance were entirely satisfied with the content of the course as well as with the positive results that followed. With regard to the intensive training offered to attain Level 3,¹ none of the agents we met with had taken this training nor did they know anyone who had.

For its part, Air Canada stated that the four-week intensive training course coupled with a follow-up training course, which has been offered for two years, has not provided the expected results, as the newly trained agents do not always make the desired efforts to attain and maintain Level 3.

We believe that Air Canada must take measures to offer language training in the workplace, particularly in airports where Air Canada has language obligations, while taking into account the language needs of employees who work on shifts. We also encourage Air Canada to consider other training methods, such as providing access to language learning software.

“They should improve access for flight attendants to language training.”

– **Flight attendant**

“Language training isn’t well promoted.”

– **Representative of the National Automobile, Aerospace, Transportation and General Workers Union of Canada**

¹ The level 3 required in the second official language is described in the *Air Canada Language Policy and Guidelines*.

Official languages obligations and language training for Jazz employees

It is important to note that Jazz is a third party under the *Official Languages Act* as it provides services on behalf of Air Canada. In accordance with its service contract, Jazz is obligated to offer inflight services on its aircraft in both official languages (Part IV) when there is a significant demand in the language of the official language minority community, and it is obligated to do so according to the provisions of the related *Regulations*. In particular, Jazz's agents must provide services in English and French on board flights on routes that are designated bilingual and in airports where Air Canada has language obligations. On August 1, 2009, Air Canada renewed its purchase contract with Jazz Air Holding GP Inc. Air Canada bought almost all Jazz's fleet capacity at predetermined prices and established Jazz's connections and schedules. This contract, which is for a little over 10 years, will end on December 31, 2020.

During the audit, we sought to determine whether Jazz's front-line agents were aware of Air Canada's obligations regarding the delivery of bilingual services on board its flights and in airports with language obligations. Moreover, we also wanted to know the type of language training that Air Canada offered to agents employed by Jazz, as Appendix 6.0 of the aforementioned service contract indicates that Air Canada will provide language training for Jazz's agents. Thus, we interviewed the person responsible for Jazz's training programs, i.e., French-language training and maintenance of skills. This interview revealed that the active offer of bilingual services obligation is part of the first level French course given to agents. With reference to obligations regarding the delivery of services in both official languages, messages are sent to the agents. We were not able to confirm this information during the audit as we were limited to a review of Air Canada's activities.

This interview also revealed that Jazz is making significant efforts to increase the number of bilingual agents and thus better serve Canadians in the official language of their choice. The collective agreement of Jazz's flight attendants states that second-language training is offered to all flight attendants and is awarded in order of seniority. We believe it to be extremely ineffective and inefficient to give language training priority to the most senior flight attendants, including those close to retirement. This approach prevents Jazz from adequately fulfilling its obligations to passengers on a long-term basis. However, when the number of flight attendants available to begin a training course at the first level is too low, unilingual flight attendants, in reverse order of seniority (least senior to

most senior), are required to take a training course in French. It is Jazz's responsibility to ensure that its language training selection process is adequate. We encourage Air Canada to share these comments with Jazz.

French-language training is spread over 12 months and involves one week of training per month, which allows flight attendants to practise speaking French between classes. Flight attendants who have not attained Level 2c, the level required to be considered bilingual at Jazz, are given one month of additional training, making a total of 16 weeks of training. It should be noted that Air Canada has established Level 3 as its requirement for an employee to be considered bilingual. There is thus a discrepancy between the levels of French required by Air Canada and Jazz, with the latter requiring a lower level. Jazz developed a four-month professional development course that was given in a specific city so that flight attendants did not have to travel in order to participate. Jazz is currently looking at tailoring a similar program for agents working at airports. The "Hello/Bonjour" video on the active offer of bilingual services developed by Air Canada is presented to agents registered in French-language training at the first level.

It should be noted that 5% of Jazz's agents (mainly flight attendants) attend French-language training every month, while 30% of agents take the skills maintenance training every month. Jazz states that the pass rate for the French-language training is 60%. The air carrier stated that it has spent over \$10 million on language training for its agents since 2000. Salaries, accommodation and travel costs are covered for front-line personnel participating in the training. The French-language training courses are held in Toronto, Calgary and Vancouver, and the skills maintenance training is given across Canada. Jazz employees who achieve Level 2c are tested every two or three years. In order to ensure its training program is appropriate, Jazz meets annually with Air Canada's language training team to discuss the two programs, and revise and adapt them as needed. Jazz informed us that 68% of its flight attendants are bilingual, according to its definition. A higher percentage of bilingual flight attendants is required, as a number of smaller aircraft operating on bilingual routes have only one flight attendant on board. Additionally, it would be important to ensure that agents who have received second-language training are assigned to flights on designated bilingual routes.

We also verified the manner in which Air Canada monitors Jazz's services in order to determine whether the services on board its aircraft and in the various airports are of equal quality in both official languages. Our findings are presented under Objective 4 of this report.

f) Verify that Air Canada takes official languages issues into account in the performance evaluations of senior executives, managers, and agents with service delivery responsibilities.

There are no official languages objectives at Air Canada nor does the carrier have a performance evaluation program for unionized employees. The performance evaluations for senior executives do not specifically take into account any language obligations arising from Part IV of the *Official Languages Act*. We believe that the following members of senior management should be held accountable for services provided in both official languages: the Executive Vice-President and Chief Operating Officer; the Senior Vice-President, Customer Service; the Senior Vice-President, Employee Relations; the Vice-President, Airports; the Vice-President, Corporate Communications, who is also the official languages champion; and all other senior executives whom Air Canada deems accountable.

Furthermore, none of the employees we met with, including managers, airport directors, service directors, flight attendants, lead agents, and customer sales and service agents, are held responsible for meeting official languages objectives. To achieve concrete results in the active offer and delivery of bilingual services of equal quality, we believe that the abovementioned personnel (including the new official languages coordinators) must also be held responsible for Air Canada's language obligations. A number of agents stated that they had not had a performance evaluation for over 10 years. A performance evaluation program specifically targeting managers and all front-line agents should also be developed and implemented.

Lastly, only the head of the Linguistic Affairs Department is held responsible for certain activities pertaining to official languages.

RECOMMENDATION 6

The Commissioner of Official Languages recommends that Air Canada include a section on implementing Part IV of the *Official Languages Act* in its mechanisms for evaluating the performance of senior managers, as well as a section on respecting Air Canada's language obligations in the performance evaluation program it will adopt for other managers, airport directors, service directors, flight attendants, lead agents, and customer sales and service agents, as well as the new official languages coordinators.

g) Verify that the unions take Air Canada's language obligations into account.

At the start of the audit, we met with several members of the National Executive Board of the Canadian Union of Public Employees (CUPE) and the National Automobile, Aerospace, Transportation and General Workers Union of Canada (CAW) to discuss the audit and get input on how they could help Air Canada comply with the *Official Languages Act*. We also followed up the request of two Jazz representatives by meeting them.

"Seniority rights are never ignored."

– Representative of the National Automobile, Aerospace, Transportation and General Workers Union of Canada

We also met with union representatives from various airports during our visits. All the representatives we interviewed supported Air Canada's language activities. However, seniority was recurrently at the centre of discussions as it remains the priority, without necessarily taking into account the bilingual profile of agents. Union representatives also told us that access to French training caused a certain degree of debate, as classes were not given during the employees' work hours. The concept of encouraging participation in language training outside of work hours appears to be problematic.

"We value seniority and Air Canada should provide bilingual services."

– Representative of the Canadian Union of Public Employees

Both unions submitted letters of agreement annexed to their collective agreements. CUPE's letter of agreement number 2, which expires in 2011, stipulates the requirements for the number of bilingual agents needed, based on the crew and aircraft. It also specifies the qualifications required, including language levels, tests, second-language training and skills maintenance training.

CAW's letter of agreement number 6, which also expires in 2011, stipulates the number of bilingual customer sales and service agents required in the various airports as well as the testing, training and seniority requirements.

RECOMMENDATION 7

The Commissioner of Official Languages recommends that, when negotiations begin, Air Canada fully examine all collective agreements for the Canadian Union of Public Employees and the National Automobile, Aerospace, Transportation and General Workers Union of Canada (CAW), including all letters of agreement relating to official languages, and make appropriate revisions that will enable Air Canada to fully comply with the requirements of Part IV of the *Official Languages Act*. In particular, Air Canada should negotiate with CAW to find an approach that will allow for greater flexibility in the assignment of bilingual agents to shifts and in service areas as well as in the number of bilingual agents required to provide Air Canada passengers with services of equal quality in English and French in all Canadian airports in which Air Canada has language obligations. All details relating to official languages should be included in the collective agreements.

OBJECTIVE 2

ENSURE THAT AIR CANADA PROVIDES SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES IN AIRPORTS IN WHICH IT HAS LANGUAGE OBLIGATIONS AND ON BOARD FLIGHTS ON DESIGNATED BILINGUAL ROUTES, AND THAT IT ACTIVELY OFFERS AND PROVIDES PASSENGERS WITH EFFECTIVE SERVICES IN BOTH OFFICIAL LANGUAGES.

a) Verify that Air Canada actively offers and provides services in both official languages in airports that receive at least one million passengers per year and in airports where there is at least a 5% demand for services from the official language minority community.

The provision of bilingual services was verified in terms of:

- the delivery of services in person, by telephone (including call centres) and through automated and electronic systems;
- displays, signs and publications;
- ground services, including check-in counters, baggage check-in counters, boarding gates, announcements, and Maple Leaf lounges, including the assignment of bilingual personnel;
- inflight services on designated bilingual routes, including the assignment of bilingual personnel.

From the outset, it was clear that there are problems with French-language services (outside of Quebec), both in the air and on the ground.

Section 28 of Part IV of the *Official Languages Act* on the active offer states that: “Every federal institution that is required under this Part to ensure that any member of the public can communicate with and obtain available services from an office or facility of that institution, or of another person or organization on behalf of that institution, in either official language shall ensure that appropriate measures are taken, including the provision of signs, notices and other information on services and the initiation of communication with the public, to make it known to members of the public that those services are available in either official language at the choice of any member of the public.”

Visual active offer (displays, publications and signs)

The displays were in both official languages in all the airports that we visited, as were the self-service check-in terminals and the publications for the travelling public. The Air Canada Web site was also in both official languages.

Our review revealed that bilingual service signage is inconsistent from one airport to another. Some counters use the “English/Français” pictogram while others use a sheet of paper that says “English/Français.” We noted that Air Canada does not have standards regarding the positioning of its bilingual service pictogram. Another relevant point is that bilingual agents are responsible for placing the pictograms on their work stations. They told us that this was not always done. Air Canada should improve this situation and establish standards to ensure that bilingual service signage is consistent across Canada, and that a monitoring mechanism is established.

Bilingual flight attendants and bilingual agents who work in airports usually wear “English/Français” pins. However, bilingual agents in airports stated that they do not always wear them. Employees in language training can wear “J’apprends le français” pins.

RECOMMENDATION 8

The Commissioner of Official Languages recommends that Air Canada carry out an analysis of its bilingual service signage in all service areas in which passengers circulate, and subsequently establish consistent standards regarding the positioning of bilingual service pictograms and develop a monitoring mechanism that ensures compliance with these standards and with the *Official Languages Act*.

Verbal active offer in person

The active offer allows Canadians to be welcomed in English and French and informed that they can receive services in the official language of their choice as expeditiously as possible.

As we have mentioned previously, Air Canada created a video called “Hello/Bonjour” that presents the institution’s obligations as well as the procedures to follow and the key messages that agents should convey in terms of the active offer of bilingual services. We salute Air Canada for this great initiative.

However, our review revealed that very few employees, including the managers we met with, knew about this video. And yet it is a tool that would help Air Canada progress in its efforts towards achieving the desired results.

It is apparent that the active offer of bilingual services is nonexistent in the vast majority of airports, as the results of the observations carried out in 2008–2009 show. The exception was Montréal’s Pierre Elliott Trudeau International Airport, where an active offer was made less than half of the time. This major shortcoming requires strong action by Air Canada. The information gathered during the audit shows that agents do not make an active offer mainly because they do not know their obligations in this respect. Some agents told us that they did not have to make an active offer because they were Anglophone. Other agents said they felt uncomfortable making an active offer because they did not want to start a conversation in French, particularly on shifts where there were no bilingual agents working.

How is it possible to explain that, in a number of airports, the managers, lead agents, and customer sales and service agents are unaware of their language obligations regarding services to the public? The vast majority of front-line agents we met with clearly stated that they do not provide active offer as it had not been asked nor required of them. Our interviews also showed that this obligation was poorly understood by the vast majority of employees. Air Canada should establish a set of guidelines and mechanisms to ensure the active offer of bilingual services in person and send a clear message regarding its language obligations.

“To be honest, there is no active offer. [translation]”
– **Customer sales and service agent**

But let’s look at a positive aspect. During the Vancouver 2010 Olympic and Paralympic Winter Games, all front-line agents working at Vancouver International Airport stated that they made an active offer and were happy to do so. The active offer was part of an awareness campaign, and agents were rewarded with gift certificates to buy coffee when they made an active offer. The agents told us that, unfortunately, the active offer of bilingual services stopped once the Games ended.

An active offer of bilingual services on board aircraft is not always provided. The flight attendants told us that they do offer bilingual services occasionally, but usually they wait to see what language the passenger uses to address them. On board, the offer of services in English and French—for example, “something to drink, quelque chose à boire”—is not systematic. It should be noted that on return flights to Vancouver, Montréal, Québec City, Ottawa, Toronto and Halifax, the offer of services should be made more frequently in French. Air Canada must raise awareness and remind flight attendants working on designated bilingual routes of their obligations regarding the active offer of bilingual services.

“‘Hello, bonjour’? No, that’s not done at all. [translation]”
– **Flight attendant**

Union representatives we met with also stated that they were not aware that a bilingual greeting was a requirement of Part IV of the *Official Languages Act*.

The constant lack of an active offer of bilingual services means that Air Canada must make some immediate changes.

RECOMMENDATION 9

The Commissioner of Official Languages recommends that Air Canada develop a strategy to ensure that flight attendants and customer sales and service agents understand the importance of bilingual greetings and that they make an active offer of services in both official languages on board aircraft and in airports where Air Canada has language obligations in order to comply with the requirements of the *Official Languages Act*.

Inflight bilingual services

There is no reference to the delivery of bilingual services in the work description in the collective agreement for flight attendants. However, all basic announcements, including welcome and safety messages, are in both English and French in the announcement manual available to all flight attendants. The service directors are responsible for making these announcements, although they may ask flight attendants to make the announcements in English and French. We were told that unilingual English-speaking service directors often make announcements in French. Some flight attendants stated that the quality of the French in such cases was sometimes so bad that it would be better if the managers did not make these announcements at all, but rather asked the bilingual flight attendant on board to do so. By providing welcome messages, Air Canada tells its passengers, “We are happy to serve you in English or French.” In order to enhance bilingual services on board its flights, we encourage Air Canada to inform passengers more clearly that there is a flight attendant on board who speaks English and French, and that they should feel free to address that attendant in the official language of their choice. Air Canada could even introduce the attendant who speaks French, giving his or her name, as is done by another air carrier.

“I didn’t know that bilingual routes existed. I thought Air Canada provided bilingual services as a courtesy.”

– Flight attendant

Impromptu announcements from the cockpit pose a problem. Although there is always a bilingual attendant on board, these messages are not always translated simultaneously or completely.

As we mentioned at the beginning of this report, 33% of the complaints received by the Office of the Commissioner of Official Languages regarding Air Canada involve inflight services. There are many reasons for this. First of all, we noted during our interviews that flight attendants do not always go get the bilingual flight attendant on board to serve a passenger who speaks to them in the other official language. Instead, they often try to make themselves understood in another manner, particularly by using a sort of sign language: for example, pointing to the drinks on the cart. It should be noted that flight attendants justify this practice citing a lack of time, particularly when flights are short and attendants have to serve passengers quickly.

We recognize that Air Canada is making an effort to ensure that there is always at least one bilingual flight attendant on board each flight, and two on larger aircraft. During a review

of over 80 lists of crew working on multiple flights, we were able to verify this practice. However, it is our conclusion that Air Canada should step up its reminders to flight attendants to ensure that, when a passenger speaks to them in French, service is given in the same language (for example, by saying “Un moment s’il vous plaît”).

“There is always at least one bilingual flight attendant on board. In large aircraft, there are two. That’s in the collective agreement.”

– Flight attendant

Turning to another issue, our interviews indicated that French-language newspapers were not provided on board flights on designated bilingual routes, particularly in the West. We ask that Air Canada take appropriate measures to remedy this situation.

Lastly, we wanted to know whether managers were informed of legal proceedings and decisions rendered concerning the delivery of services in English and French by Air Canada. None of the managers we met with knew about these decisions. We believe that sharing this information would make managers more aware of the institution’s obligations, and would help improve the monitoring of all Air Canada’s official languages activities.

Bilingual services on the ground

The audit revealed that there are weaknesses in all airports in terms of bilingual service delivery, although the results were better in Montréal. Significant shortcomings were noted in all airport service areas, where services were rarely of equal quality in both official languages or were not available in French, which explains the high percentage of complaints received by the Office of the Commissioner of Official Languages against Air Canada on this issue (67%). The following paragraphs give an overview of the situations and information gathered during our interviews.

At flight and baggage check-in counters and also in service areas with self-service check-in terminals, Canadians expect to be able to communicate with Air Canada personnel in the official language of their choice after having waited in line. Our on-site observations indicated less than stellar performance in this respect, with the exception of Montréal’s Pierre Elliott Trudeau International Airport. There were no bilingual agents in the welcome area, or at the counter for business class, elite and super elite members. The same situation was observed at the counter for passengers with special needs, such as those in wheelchairs. Other observations noted at the check-in counter for economy class showed that not only did the agent not

provide an active offer of bilingual services, no effort was made to go and find a bilingual agent. The customer was simply told, “Sorry, I don’t speak French,” despite the fact that there was a bilingual agent at another counter. This situation clearly demonstrates that Air Canada’s agents are not fully aware of their bilingual service delivery obligations. The negative attitude of some agents regarding official languages was also raised during our interviews.

We reviewed the work description in the collective agreement for customer sales and service agents to identify their bilingual service requirements and mandatory skills. The description is very vague and does not mention that services must be provided in both official languages. We learned that this description is more than 10 years old. It requires a revision in order to better reflect the realities of the agents’ jobs. Nonetheless, most of the agents we met with were quite willing to serve passengers in both official languages.

In terms of bilingual service delivery, we suggest that Air Canada examine, among other options, the possibility of establishing a sufficient number of designated bilingual counters and lines in the check-in area, thus ensuring that there are always bilingual agents available to provide services of equal quality in English and French. This should be done in all airports where Air Canada has language obligations, except at Montréal’s Pierre Elliott Trudeau International Airport, where all of the customer sales and service agents are bilingual. In addition to ensuring quality services in both official languages without a delay to find a bilingual agent, this approach would allow passengers to stay in one spot with their bags rather than having to take their luggage to another counter. We also suggest that Air Canada appoint a bilingual agent (floating bilingual agent) on each shift who could act as a resource person when there is a request in the other official language. The name of this agent would be communicated to front-line employees. Having an identified resource person would eliminate a number of the steps usually taken to find a bilingual agent. In some airports, agents indicated that they did not know which agents were officially bilingual, unless they had the work schedule indicating who was bilingual at hand.

We wish to point out that the vast majority of managers and lead customer sales and service agents we met with were unilingual, and yet they are required to help passengers in complex situations (for example, when a flight is cancelled) as well as evaluate the quality of the agents’ work, including customer service provided in French. In this respect, the work description in the collective agreement for lead agents states that: “The principal functions of a lead agent are to provide leadership, support and direction to a group of employees

in the areas of technical expertise, customer service and operational demands while remaining a full working member of that group. Additional responsibilities include employee assignment, on-the-job training and instruction.” In light of the above, we believe that Air Canada should analyze and evaluate this situation and take the necessary measures to remedy the lack of bilingual managers and lead agents, which could have a negative effect on monitoring the quality of services provided in the language of the official language minority community.

When discussing services provided in English and French, airport ground personnel seemed to think that the main aspect of delivering bilingual services was the announcements made at boarding gates, as they often referred to these. The agents told us that the announcements were made using an automated system or MP3 players, but that in airports where there were no automated systems, they were made by the agents themselves. The agents also informed us that they had the option of making the announcements themselves rather than using an automated system. The results of the audit show that often neither scripted nor unscripted announcements were provided in both English and French. After examining the customer sales and service agents’ work schedules, we noted that there was very often a lack of bilingual agents at boarding and arrival gates.

It is important to reiterate that failing to provide timely translations of personalized or unscripted messages simultaneously can have a negative impact on Francophone passengers, and can even cause them to miss their flights. Passengers could also miss out on a compensation offer when there is an overbooking, because in most airports, these messages are never translated. The reason given by agents for not providing a translation or using the automated systems was lack of time due to having to proceed with boarding within a short timeframe. With respect to the use of MP3 players in airports not equipped with automated systems, we were told that, although the messages are complete, the sound quality can make hearing them rather difficult, and that using these devices can prove problematic. Since automated systems are the responsibility of airport authorities, we encourage Air Canada to negotiate with them to have access to automated systems that are consistent from one station to the next in order to ensure services of equal quality in both official languages across Canada.

In light of the aforementioned observations, it is worrying to see that the planning for the provision of bilingual services is unsatisfactory with respect to bilingual service signage, and the active offer and delivery of bilingual services in person in flight and at check-in counters, at boarding and arrival gates, and

in announcements made in English and in French. Significant shortcomings were also noted when the resource planning unit assigns bilingual personnel to different service areas on a daily basis. Air Canada should fully review its planning for the provision of bilingual services and apply more effective practices to comply with the *Official Languages Act*. Moreover, Air Canada directors in airports should take concrete measures, take their regional realities into account, and comply with the directives from national senior executives. See Recommendation 10.

Call centres

Air Canada customers who telephone from within Canada and the United States use the 1-888-247-2262 toll-free number. The international network branch handles calls from abroad.

An interactive telephone system directs the call to a qualified agent when the customer has identified his or her preferred language. Although there are bilingual agents outside of Quebec, all agents at the Montréal call centre are bilingual, and this centre offers service 24 hours a day, 7 days a week. Air Canada reports that 60% of agents who work in call centres are bilingual. Air Canada stated that there is quality control on incoming calls in the call centres and that the response time is the same for calls in English and French. The interviews we conducted with representatives of the official language minority communities revealed that sometimes the waiting time can be longer when they choose the “French” option, and that by switching to the “English” option they are served more quickly.

Maple Leaf lounges

During our visit to Maple Leaf lounges, we observed that there were no bilingual agents at the reception counters of many of these lounges. In addition, the personnel working for the catering companies were unilingual Anglophones. However, we noted that Air Canada’s publications were bilingual, and that there was at least one French-language magazine on the racks. We would have expected there to be at least one bilingual agent checking the boarding passes of passengers entering the lounges.

b) Verify that the bilingual capacity of Air Canada's flight attendants and customer sales and service agents is sufficient to ensure the effective delivery of services of equal quality in English and in French.

The Linguistic Affairs Department has data on the ratio of flight attendants and customer sales and service agents who are bilingual in the airports. A Level 3 language profile is required for all bilingual agents. During the course of the audit, Air

Canada performed an analysis to determine the number of positions that would be required to be able to provide services of equal quality in the language of the official language minority community in the various areas of the airports.

A significant number of managers we met with told us that recruiting bilingual agents was difficult, and they acknowledged that there were not enough bilingual agents. The situation is particularly critical in the West, where only one agent in five is bilingual, which means passengers do not always have access to services in the language of the official language minority community.

The interviews we conducted with agents and managers as well as our review of work schedules revealed that there is a lack of bilingual agents across Canada, except at Montréal’s Pierre Elliott Trudeau International Airport. We also noted a lack of bilingual agents on some work shifts and a significant lack of bilingual agents in various service areas. A number of managers we met with attributed this situation to the fact that, when Air Canada merged with Canadian Airlines International, the vast majority of the latter’s employees were unilingual.

On a different issue, we noted a lack of awareness concerning the staffing of bilingual personnel. While the current policy stipulates that “the management of the location concerned and the Linguistic Affairs division identify all positions requiring knowledge of both languages,” the managers we met with were rarely informed of the number of bilingual agents they needed to offer services of equal quality in both official languages at all times. However, the General Manager, Linguistic Affairs Department, regularly sends data on the number of bilingual agents to directors working in the airports. Job advertisements published in newspapers indicate language requirements for positions. Air Canada should ensure that the external firm hired to handle the recruitment of agents is fully informed of the company’s language obligations.

“I don’t know the number of bilingual agents we would need, but there are not enough at the moment. When we hire, we really do look for bilingual personnel.”

– Manager

“The bilingual capacity at the airport is insufficient to meet the demand.”

– Manager

The following tables show the distribution of bilingual and unilingual positions for flight attendants and customer sales and service agents in airports and call centres.

Language Qualifications—INFLIGHT SERVICE

December 15, 2010

Inflight service base	Total personnel	Bilingual employees	%
Vancouver	1235	276	22
Calgary	361	139	39
Toronto	3429	1535	45
Montréal	902	866	96
TOTAL	5927	2816	48

Language Qualifications—AIRPORTS

December 15, 2010

Airport	Total personnel	Bilingual employees	%
Vancouver	404	39	10
Calgary	244	24	10
Edmonton	114	8	7
Regina	4	2	50
Winnipeg	85	19	22
Toronto	1243	172	14
Ottawa	157	84	54
Montréal	447	401	90
Halifax	129	22	17
St. John's	48	5	10
TOTAL	2875	777	27

Language Qualifications—CALL CENTRES

December 15, 2010

Call centre	Total personnel	Bilingual employees	%
Calgary	11	0	0
Winnipeg	129	76	59
Toronto	123	28	23
Montréal	165	164	99
Saint John	181	102	56
TOTAL	609	370	61

N.B. Data provided by Air Canada

RECOMMENDATION 10

The Commissioner of Official Languages recommends that Air Canada thoroughly examine:

- a) the number of bilingual service directors, flight attendants, lead agents, customer sales and service agents, and managers required to ensure that services of equal quality are provided in English and French inflight and in airports where Air Canada has language obligations across Canada, and
- b) the planning for the provision of bilingual services for all its activities, as well as the assignment of bilingual agents to various service areas (including the cockpit) in order to maximize its resources.

OBJECTIVE 3

ENSURE THAT AIR CANADA CONSULTS REPRESENTATIVES OF OFFICIAL LANGUAGE MINORITY COMMUNITIES IN THE VARIOUS REGIONS AND THAT IT TAKES THE RESULTS OF THESE CONSULTATIONS INTO CONSIDERATION WHEN PLANNING FOR THE PROVISION OF BILINGUAL SERVICES.

a) Verify that Air Canada consults the official language minority communities in all regions of Canada to identify their service needs and determine whether they are informed of the decisions made.

We verified whether Air Canada had formally consulted representatives of the English- and French-speaking minority communities to identify their needs as customers. It had not. We were told that some flights and frequencies had been modified to meet the needs of the official language minority communities. Air Canada also told us that it supported a variety of activities that the official language minority communities took part in, such as the Rendez-vous de la Francophonie and Francophone festivals throughout Canada.

The representatives of the official language minority communities that we interviewed stated that Air Canada was making efforts to improve the quality of its bilingual services; however, they advised us of the following shortcomings:

- lack of active offer at airports;
- lack of pictograms;
- lack of bilingual agents at check-in counters for domestic and international flights: passengers who request service in French can receive it provided that they are able to wait;
- lack of bilingual announcements, even when the agent at the boarding gate is bilingual;

- lack of bilingual agents at baggage services;
- lack of active offer of bilingual services inflight (except on board flights to Montréal and Ottawa);
- longer wait times to receive services from call centres when the “French” option is chosen;
- negative attitude of Air Canada employees and lack of openness regarding official languages.

We should nevertheless be pleased that representatives of official language minority communities have clearly shown their interest in being consulted as part of Air Canada’s overall activities. In addition to carrying out organized and structured consultations, Air Canada would do well to work with organizations representing official language minority communities across Canada: for example, during recruitment campaigns, as some organizations have pools of bilingual candidates who could fit the desired profile for positions at Air Canada.

In our opinion, Air Canada should reflect on the impact of the decision rendered in the *DesRochers* case regarding the delivery of services to the public. Consulting with official language minority communities would not prevent Air Canada from respecting its organizational priorities. Taking their needs into account could be beneficial for both language communities, minority and majority. In summary, Air Canada needs to be aware of how its decisions in all areas of activity affect the official language minority communities.

RECOMMENDATION 11

The Commissioner of Official Languages recommends that Air Canada consult official language minority communities in order to take their specific needs into account when making decisions that affect route planning and bilingual services. During its regular and formal consultations with various concerned parties, Air Canada should target national, provincial and regional representatives of official language minority communities and inform them of any decisions made.

OBJECTIVE 4

ENSURE THAT AIR CANADA EFFECTIVELY MONITORS ITS PERFORMANCE IN THE DELIVERY OF SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES, IN THE AIR AND ON THE GROUND.

a) Verify that Air Canada has effective oversight mechanisms (including internal auditing and the office of the ombudsman) to ensure that all its services are of equal quality in both official languages, in the air and on the ground.

The *enRoute* magazine, published every month and offered on all aircraft, features a column on official languages called “The choice is yours ... The pleasure to serve you is ours,” which invites passengers to send their questions or comments on Air Canada’s services in the official language of their choice to ollo@aircanada.ca. Some 80 e-mails were received in 2010, about half of which were complaints.

During the past year, Air Canada launched the Dialogue language prize so that passengers can nominate agents who served them in both official languages. Although there have been 10 winners following the nomination of 44 employees, very few managers, flight attendants or airport ground personnel we met with knew about this program. Passengers can also use the “Air Smiles” card to highlight an exceptional experience on a flight, including services received in both official languages. Passengers must ask the flight attendants for these cards. We were told that customer service management had received about 165 of these cards in the past year; however, the Linguistic Affairs Department had only received one comment regarding official languages.

In addition to these mechanisms, Air Canada has a contract with Ipsos Reid and receives monthly results from marketing survey studies on passengers’ views on services offered inflight and in airports. The subject of official languages is incorporated into the survey conducted among Aeroplan members to determine whether passengers were served in the official language of their choice at the check-in counter, at the boarding gate and on board. One question also concerns bilingual announcements made on board. We believe that if managers made a thorough analysis of the monthly reports that deal explicitly with the services offered in the language of the official language minority community, they would be able to better identify shortcomings, and subsequently determine and implement the necessary oversight mechanisms.

Air Canada also uses the services of an external firm to evaluate the quality of its services on board international flights, using mystery shoppers. Around 60 surveys, which include questions relating to services received in both official languages, are conducted monthly and a report is prepared.

It is important to ensure that senior management conducts follow-ups with Air Canada’s directors in airports where Air Canada has language obligations. They in turn must follow up with managers so that action is taken based on the results of the monitoring reports.

We also learned that some employees conduct quality control on announcements made in airports. However, our interviews showed that it is the automated announcements in particular that are observed to ensure that announcements in French follow announcements made in English, and vice versa for announcements in Quebec. Live announcements, which must also be made in both official languages, are not observed or evaluated to ensure that they are of equal quality. We believe that personalized announcements (for example, paging a passenger in the airport) and unscripted announcements should be evaluated in the same manner as the automated announcements.

Air Canada indicated that it also regularly monitors the quality of the bilingual services provided by call centre agents.

Official languages issues are not included in internal audits and are not in Air Canada’s plans. Once Air Canada has implemented our recommendations, we encourage it to monitor its progress, by conducting an internal audit, for example, or by determining another means of ensuring the smooth functioning of the implementation of all components of Part IV of the *Official Languages Act*, with the goal of making any necessary corrections.

We wanted to verify that any complaints or situations relating to official languages had been submitted to the office of the ombudsman, but we were informed that there is no longer an ombudsman at Air Canada.

b) Verify that Air Canada ensures that Jazz offers services of equal quality in both official languages.

Air Canada has not established procedures to verify the quality of services provided by Jazz in the language of the official language minority community to ensure the effective implementation of the service agreement.

c) Verify that monitoring results are used in managing the quality of services with the aim of continuing to improve and secure tangible results.

Our interviews revealed that managers and front-line personnel receive very little information about the quality of bilingual services provided and the resultant positive or negative results. In particular, the lack of quality management for personalized and unscripted announcements and for regular bilingual announcements in airports with no automated systems means that there is no way to ensure appropriate follow-up.

In terms of bilingual capacity, during the audit Air Canada reviewed the number of bilingual agents required to meet the demand in the air and on the ground. The audit has led us to conclude that Air Canada is not able to control the quality of all its services in English and French, particularly with respect to announcements and to the active offer and delivery of services, as it has not established proper monitoring mechanisms to ensure continual improvement and tangible results.

RECOMMENDATION 12

The Commissioner of Official Languages recommends that Air Canada institute structured monitoring mechanisms in order to ensure the availability and quality of services in both official languages in all its areas of activity, as well as those of Jazz, both inflight on designated bilingual routes and in airports where Air Canada has language obligations. Air Canada should take all necessary measures to address the shortcomings noted during the monitoring process and periodically report on results.

CONCLUSION

The audit's aim was to examine and report on any significant problems within Air Canada with respect to the application of Part IV of the *Official Languages Act*. The goal was also to obtain a commitment from Air Canada senior executives to remedy the observed shortcomings.

In summary, the audit highlighted some positive observations and revealed others that require improvements to ensure that Air Canada fully complies with the *Official Languages Act*. It is clear that Air Canada has a good number of tools to implement Part IV of the Act. We believe that the measures to be adopted can be achieved quite easily.

We sought to determine whether Air Canada's senior management were committed to providing passengers with services of equal quality in both official languages; whether Air Canada actively offered and provided services in both official languages in airports where it has language obligations and on flights on designated bilingual routes; whether it consulted representatives of official language minority communities in the various regions to identify their bilingual service needs; and whether it effectively monitored the quality of its service delivery performance in the language of the official language minority community, both in the air and on the ground.

Air Canada has a structure to manage the various parts of the *Official Languages Act* and has appointed an official languages champion. Air Canada has an official languages policy and action plan that must be updated as they do not take into account all the components of Part IV of the Act, nor the air carrier's current realities. Air Canada has a number of means at its disposal for communicating language obligations to its personnel. It has produced a video on the active offer of bilingual services. Unfortunately, the results of the audit show significant shortcomings in the knowledge managers and agents have of Air Canada's obligations with respect to the active offer and delivery of bilingual services. There are also language training and maintenance of skill courses for Air Canada and Jazz employees, although some aspects of these courses could be improved.

During the audit, we met with representatives from the Canadian Union of Public Employees and the National Automobile, Aerospace, Transportation and General Workers Union of Canada, who are important allies in official languages issues. They all demonstrated their support for Air Canada's obligations to communicate with the public in the language of the official language minority community.

This audit has led us to conclude that Air Canada must adopt a management approach that further incorporates official languages into its activities in order to offer all of its customers bilingual services of equal quality. Air Canada does not have an official languages accountability framework that sets forth guidelines for the effective management of official languages issues as well as the roles and responsibilities of the official languages champion, senior executives and all managers and agents who are responsible, directly or indirectly, for the active offer and delivery of bilingual services in the air and on the ground. Likewise, Air Canada has no employee performance evaluation mechanisms that take into account the institution's obligations under Part IV of the *Official Languages Act*. Moreover, Air Canada does not have a network of official languages coordinators, who could play an important role within the company. Senior executives and managers must play a key role in the implementation of the *Official Languages Act*. A change is required in Air Canada's organizational culture and leadership that must begin at the top level and filter down through all levels.

Furthermore, it should be acknowledged that the planning for the provision of bilingual services pertaining to Air Canada's activities in its various service areas is not always straightforward or appropriate. A comprehensive audit is required so that the necessary corrective measures can be identified and implemented. Weaknesses were also noted with respect to the bilingual capacity of the agents in a number of airports. It should be noted that we congratulate Air Canada for the efforts it has made at Montréal's Pierre Elliott Trudeau International Airport, where all of its agents are bilingual.

During the audit, we also examined whether Air Canada had consulted the official language minority communities in an organized and structured manner. These consultations had not taken place.

Lastly, we evaluated the monitoring mechanisms that exist for air and ground services, and conclude that work remains to be done to achieve the desired results. There is also a lack of monitoring of the bilingual services provided by Jazz, even though there is a language clause in the service contract between Jazz and Air Canada. Air Canada should make a firmer commitment in this regard.

The Commissioner of Official Languages has made 12 recommendations to help Air Canada improve its service delivery to passengers in both official languages. These recommendations are listed in Appendix B. We maintain that full implementation of all recommendations is necessary for Air Canada to be able to meet its obligations under the *Official Languages Act* regarding communications with and delivery of bilingual services to the public.

APPENDIX A

LIST OF AUDIT OBJECTIVES AND CRITERIA

OBJECTIVES	CRITERIA
<p>1. Ensure that Air Canada senior management is committed to implementing Part IV of the <i>Official Languages Act</i>, thereby providing Air Canada passengers with services of equal quality in both official languages.</p>	<p>a) Verify that Air Canada has an official languages accountability framework.</p> <p>b) Verify that Air Canada’s official languages action plan allows for the effective implementation of Part IV of the <i>Official Languages Act</i> with regard to services offered in the air and on the ground, in person, by telephone, in writing and via automated and electronic systems.</p> <p>c) Verify that Air Canada has an official languages policy (or guidelines) that takes into account all of the components relating to services to the public, that is approved by senior management and that is in compliance with the <i>Official Languages Act</i> and its regulations.</p> <p>d) Verify that Air Canada is effective in informing all personnel assigned to inflight and ground service delivery, either in person or by telephone, and personnel responsible for automated and electronic systems of the requirements regarding service delivery in both official languages.</p> <p>e) Verify that Air Canada’s training modules, which are given to both its own employees and those of Jazz, include Air Canada’s obligations and employees’ responsibilities pertaining to official languages.</p> <p>f) Verify that Air Canada takes official languages issues into account in the performance evaluations of senior executives, managers, and agents with service delivery responsibilities.</p> <p>g) Verify that the unions take Air Canada’s language obligations into account.</p>
<p>2. Ensure that Air Canada provides services of equal quality in both official languages in airports in which it has language obligations and on board flights on designated bilingual routes, and that it actively offers and provides passengers with effective services in both official languages.</p>	<p>a) Verify that Air Canada actively offers and provides services in both official languages in airports that receive at least one million passengers per year and in airports where there is at least a 5% demand for services from the official language minority community.</p> <p>b) Verify that the bilingual capacity of Air Canada’s flight attendants and customer sales and service agents is sufficient to ensure the effective delivery of services of equal quality in English and in French.</p>
<p>3. Ensure that Air Canada consults representatives of official language minority communities in the various regions and that it takes the results of these consultations into consideration when planning for the provision of bilingual services.</p>	<p>a) Verify that Air Canada consults the official language minority communities in all regions of Canada to identify their service needs and determine whether they are informed of the decisions made.</p>
<p>4. Ensure that Air Canada effectively monitors its performance in the delivery of services of equal quality in both official languages, in the air and on the ground.</p>	<p>a) Verify that Air Canada has effective oversight mechanisms (including internal auditing and the office of the ombudsman) to ensure that all its services are of equal quality in both official languages, in the air and on the ground.</p> <p>b) Verify that Air Canada ensures that Jazz offers services of equal quality in both official languages.</p> <p>c) Verify that monitoring results are used in managing the quality of services with the aim of continuing to improve and secure tangible results.</p>

APPENDIX B

LIST OF RECOMMENDATIONS BY OBJECTIVE

OBJECTIVE 1

ENSURE THAT AIR CANADA SENIOR MANAGEMENT IS COMMITTED TO IMPLEMENTING PART IV OF THE *OFFICIAL LANGUAGES ACT*, THEREBY PROVIDING AIR CANADA PASSENGERS WITH SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES.

RECOMMENDATION 1

The Commissioner of Official Languages recommends that Air Canada develop and implement an accountability framework for official languages in order to clearly define the roles and responsibilities of its personnel with respect to the various requirements of the *Official Languages Act*, particularly those relating to bilingual service delivery. This framework should also include coordination mechanisms and determine how managers will be held accountable. It should be communicated to all personnel.

RECOMMENDATION 2

The Commissioner of Official Languages recommends that Air Canada ensure it has the necessary human and financial resources to implement Part IV of the *Official Languages Act*.

RECOMMENDATION 3

The Commissioner of Official Languages recommends that Air Canada establish a new action plan on the effective implementation of Part IV and the other parts of the *Official Languages Act* in order to ensure services of equal quality in English and French in its various sectors of activity. This plan should include the visual active offer of bilingual services as well as the active offer of bilingual services in the air, on the ground and in call centres. The plan should include specific measures accompanied by deadlines, performance indicators and an accountability mechanism. For their part, Air Canada directors/managers in airports could also draw up an official languages action plan, presenting specific measures reflecting their particular situations in matters of bilingual service delivery. These plans, which could be based on Air Canada's plan, should be communicated to all personnel.

RECOMMENDATION 4

The Commissioner of Official Languages recommends that Air Canada develop a new directive or policy that takes into account its structure and its realities, and that covers all of its responsibilities as set forth under Part IV of the *Official Languages Act*. This policy should be effectively communicated to all of its personnel, and reminders should be sent regularly to ensure its implementation.

RECOMMENDATION 5

The Commissioner of Official Languages recommends that Air Canada take concrete and effective measures to raise awareness among managers, service directors, flight attendants, lead agents, and customer sales and service agents of the company's responsibilities pertaining to the active offer and delivery of bilingual services under Part IV of the *Official Languages Act*.

RECOMMENDATION 6

The Commissioner of Official Languages recommends that Air Canada include a section on implementing Part IV of the *Official Languages Act* in its mechanisms for evaluating the performance of senior managers, as well as a section on respecting Air Canada's language obligations in the performance evaluation program it will adopt for other managers, airport directors, service directors, flight attendants, lead agents, and customer sales and service agents, as well as the new official languages coordinators.

RECOMMENDATION 7

The Commissioner of Official Languages recommends that, when negotiations begin, Air Canada fully examine all collective agreements for the Canadian Union of Public Employees and the National Automobile, Aerospace, Transportation and General Workers Union of Canada (CAW), including all letters of agreement relating to official languages, and make appropriate revisions that will enable Air Canada to fully comply with the requirements of Part IV of the *Official Languages Act*. In particular, Air Canada should negotiate with CAW to find an approach that will allow for greater flexibility in the assignment of bilingual agents to shifts and in service areas as well as in the number of bilingual agents required to provide Air Canada passengers with services of equal quality in English and French in all Canadian airports in which Air Canada has language obligations. All details relating to official languages should be included in the collective agreements.

OBJECTIVE 2

ENSURE THAT AIR CANADA PROVIDES SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES IN AIRPORTS IN WHICH IT HAS LANGUAGE OBLIGATIONS AND ON BOARD FLIGHTS ON DESIGNATED BILINGUAL ROUTES, AND THAT IT ACTIVELY OFFERS AND PROVIDES PASSENGERS WITH EFFECTIVE SERVICES IN BOTH OFFICIAL LANGUAGES.

RECOMMENDATION 8

The Commissioner of Official Languages recommends that Air Canada carry out an analysis of its bilingual service signage in all service areas in which passengers circulate, and subsequently establish consistent standards regarding the positioning of bilingual service pictograms and develop a monitoring mechanism that ensures compliance with these standards and with the *Official Languages Act*.

RECOMMENDATION 9

The Commissioner of Official Languages recommends that Air Canada develop a strategy to ensure that flight attendants and customer sales and service agents understand the importance of bilingual greetings and that they make an active offer of services in both official languages on board aircraft and in airports where Air Canada has language obligations in order to comply with the requirements of the *Official Languages Act*.

RECOMMENDATION 10

The Commissioner of Official Languages recommends that Air Canada thoroughly examine:

- a) the number of bilingual service directors, flight attendants, lead agents, customer sales and service agents, and managers required to ensure that services of equal quality are provided in English and French inflight and in airports where Air Canada has language obligations across Canada, and
- b) the planning for the provision of bilingual services for all its activities, as well as the assignment of bilingual agents to various service areas (including the cockpit) in order to maximize its resources.

OBJECTIVE 3

ENSURE THAT AIR CANADA CONSULTS REPRESENTATIVES OF OFFICIAL LANGUAGE MINORITY COMMUNITIES IN THE VARIOUS REGIONS AND THAT IT TAKES THE RESULTS OF THESE CONSULTATIONS INTO CONSIDERATION WHEN PLANNING FOR THE PROVISION OF BILINGUAL SERVICES.

RECOMMENDATION 11

The Commissioner of Official Languages recommends that Air Canada consult official language minority communities in order to take their specific needs into account when making decisions that affect route planning and bilingual services. During its regular and formal consultations with various concerned parties, Air Canada should target national, provincial and regional representatives of official language minority communities and inform them of any decisions made.

OBJECTIVE 4

ENSURE THAT AIR CANADA EFFECTIVELY MONITORS ITS PERFORMANCE IN THE DELIVERY OF SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES, IN THE AIR AND ON THE GROUND.

RECOMMENDATION 12

The Commissioner of Official Languages recommends that Air Canada institute structured monitoring mechanisms in order to ensure the availability and quality of services in both official languages in all its areas of activity, as well as those of Jazz, both inflight on designated bilingual routes and in airports where Air Canada has language obligations. Air Canada should take all necessary measures to address the shortcomings noted during the monitoring process and periodically report on results.

APPENDIX C

LIST OF RECOMMENDATIONS BY OBJECTIVE, AIR CANADA'S COMMENTS AND ACTION PLAN, AND THE COMMISSIONER'S COMMENTS

We are satisfied with the measures and timeframes proposed in Air Canada's action plan, with the exception of the follow-ups to Recommendation 11, with which we are only partially satisfied. We believe that Air Canada should commit itself more to holding consultations with official language minority communities and strengthen its mechanisms to gain a better understanding of passenger needs. In our view, the implementation of the 12 recommendations is essential to enable Air Canada to fulfill its obligations with regard to the delivery of services in English and French. We must also note Air Canada's excellent cooperation throughout the audit, as well as its willingness to improve its official languages program, which impacts all services provided to passengers.

OBJECTIVE 1

ENSURE THAT AIR CANADA SENIOR MANAGEMENT IS COMMITTED TO IMPLEMENTING PART IV OF THE *OFFICIAL LANGUAGES ACT*, THEREBY PROVIDING AIR CANADA PASSENGERS WITH SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES.

RECOMMENDATION 1

The Commissioner of Official Languages recommends that Air Canada develop and implement an accountability framework for official languages in order to clearly define the roles and responsibilities of its personnel with respect to the various requirements of the *Official Languages Act*, particularly those relating to bilingual service delivery. This framework should also include coordination mechanisms and determine how managers will be held accountable. It should be communicated to all personnel.

Air Canada's comments and action plan²

As Canada's principal air carrier, Air Canada is pleased to promote the principles of English and French duality, as outlined in the *Official Languages Act*. No other North American carrier offers throughout its world-wide network with such consistency services in both official languages, English and French. Air Canada accepts this role, not so much out of compliance and commercial sense but rather as mark of respect for the duality of languages that exist in this country.

Air Canada has a language policy and language guidelines, a Code of Conduct and many other guiding tools for managers and employees regarding the company's language obligations. As per the audit findings, Air Canada realizes that, even with the existing tools, the application of the company's linguistic obligations and the roles and responsibilities need to be clarified. Air Canada proposes the implementation of the following enhanced measures.

Air Canada will develop and implement an accountability framework for official languages by the end of the year, which will include the guiding principles for the effective management of official languages. This will also include:

- The designation of the Accountable Executive and the corporate champion for official languages;
- Clear expectations for all employee groups on their roles and responsibilities;
- Code of Conduct in regard to official languages;
- Documented business processes for official languages.

Commissioner's comments

We are satisfied with the measures and timeframe proposed for establishing an accountability framework. In our opinion, the establishment of a network of official languages coordinators could be part of new official languages management processes. Air Canada should also develop a communications strategy to inform all staff of their obligations under Part IV of the Act.

RECOMMENDATION 2

The Commissioner of Official Languages recommends that Air Canada ensure it has the necessary human and financial resources to implement Part IV of the *Official Languages Act*.

Air Canada's comments and action plan

Unlike government institutions that are subject to the *Official Languages Act*, Air Canada receives no direct or indirect funding for language training, testing or communication. Despite this fact, Air Canada has allocated significant resources (financial and human) to maintain its language programs and has never challenged the budget for language training or testing. As more of our commitment to the *Official Languages Act*, in the force of economic downturns, the *Companies' Creditors Arrangement Act*, etc., Linguistic Affairs is one of the very few departments

² The action plan and the comments submitted by Air Canada are published in their entirety in this report.

that has not seen its budget or programs reduced over the years. Local managers have demonstrated leadership in initiating awareness sessions, in training and in developing new tools to help their employees deliver service in the customer's language of choice. In order to ensure proper follow-ups are conducted and that actions are taken when required, Air Canada will implement the following enhanced measures.

Air Canada has an official languages program that is managed by the General Manager, Linguistic Affairs. In order to bring higher visibility to this resource and to ensure Air Canada has the necessary human and financial resources to implement Part IV of the *Official Languages Act*, Air Canada will:

- Systemically review findings and actions at the Senior Executive level;
- Conduct regular meetings with key internal stakeholders on the development progress of the business processes in support of the official languages.

Commissioner's comments

We are satisfied with the follow-ups proposed in response to this recommendation.

RECOMMENDATION 3

The Commissioner of Official Languages recommends that Air Canada establish a new action plan on the effective implementation of Part IV and the other parts of the *Official Languages Act* in order to ensure services of equal quality in English and French in its various sectors of activity. This plan should include the visual active offer of bilingual services as well as the active offer of bilingual services in the air, on the ground and in call centres. The plan should include specific measures accompanied by deadlines, performance indicators and an accountability mechanism. For their part, Air Canada directors/managers in airports could also draw up an official languages action plan, presenting specific measures reflecting their particular situations in matters of bilingual service delivery. These plans, which could be based on Air Canada's plan, should be communicated to all personnel.

Air Canada's comments and action plan

As outlined in the Commissioner's report, the 2001–2010 Official Languages Action Plan was specifically designed to address operational issues resulting from the merger with Canadian Airlines in 2001.

Since then, many initiatives and accomplishments have been realized to improve employee awareness of Air Canada's official languages obligations and service delivery to our customers. The following examples identify some of the key action items implemented in the past ten years:

- aerovocab (bilingual pocket-sized booklet that helps employees quickly find proper words frequently used in airline terminology);
- eLang (online management application for language testing);
- video on active offer, presentation to all new frontline employees;
- brochure on official languages obligations;
- e-mail address available to customers specifically for language complaints;
- customer satisfaction surveys;
- quality assurance observations;
- linguistic award;
- on-line training;
- individual coaching by language instructors;
- Air Canada official languages obligations in orientation kit;
- Air Canada official languages obligations presentation to all new frontline employees;
- biodegradable pens promoting service in English and French.

Air Canada recognizes the value of having a new official languages action plan to align its language activities and initiatives.

Air Canada will develop a new three-year action plan that will ensure continued compliance with Part IV of the *Official Languages Act* and complement our commercial goals. It will include:

- The specific details on how Air Canada will effectively implement Part IV and the other parts of the *Official Languages Act*;
- Deadlines and performance indicators;
- Accountability mechanism.

Commissioner's comments

We recognize the efforts made over the past 10 years and are satisfied with the proposed measures. However, when developing its official languages action plan, Air Canada should include all components related to Part IV of the Act, as well as all measures proposed for each recommendation presented in this report, to obtain concrete and sustainable results.

RECOMMENDATION 4

The Commissioner of Official Languages recommends that Air Canada develop a new directive or policy that takes into account its structure and its realities, and that covers all of its responsibilities as set forth under Part IV of the *Official Languages Act*. This policy should be effectively communicated to all of its personnel, and reminders should be sent regularly to ensure its implementation.

Air Canada's comments and action plan

Air Canada used many media vehicles to communicate directives on official languages to employees such as *Globe*, the customer service magazine, the *Daily*, a daily newsletter available to all employees, and staff meetings.

Air Canada has a language policy that will be updated by the third quarter to reflect current realities and include components of our language business processes. Once it is updated, it will be communicated to all employees.

Commissioner's comments

We are satisfied with the measures and timeframe proposed for the update of the official languages policy. We acknowledge Air Canada's commitment to communicate, on a systematic and regular basis, its language policy and obligations under the Act, as described in its response to Recommendation 9.

RECOMMENDATION 5

The Commissioner of Official Languages recommends that Air Canada take concrete and effective measures to raise awareness among managers, service directors, flight attendants, lead agents, and customer sales and service agents of the company's responsibilities pertaining to the active offer and delivery of bilingual services under Part IV of the *Official Languages Act*.

Air Canada's comments and action plan

Air Canada already has a number of existing tools to communicate and inform its employees and managers regarding the obligations under Part IV of the *Official Languages Act*, such as an eLearning video on active offer, awareness sessions for new hires and other types of reminders. Once the business processes are developed in support of the official languages, Air Canada will streamline all communication vehicles available to improve efficiency.

Air Canada has many media vehicles available to communicate with its employees. It will raise awareness of its linguistic obligations by:

- Using all available media vehicles to effectively communicate employee responsibilities;
- Updating employee indoctrination requirements;
- Reviewing and updating language qualifications requirements for Air Canada, Jazz and other potential required affiliates.

Commissioner's comments

We are satisfied with the proposed measures. It is our view that using an effective communications strategy for the release (and reminders) of the new official languages accountability framework, action plan and policy will give staff a better understanding of their responsibilities in terms of active offer and service delivery in both official languages.

RECOMMENDATION 6

The Commissioner of Official Languages recommends that Air Canada include a section on implementing Part IV of the *Official Languages Act* in its mechanisms for evaluating the performance of senior managers, as well as a section on respecting Air Canada's language obligations in the performance evaluation program it will adopt for other managers, airport directors, service directors, flight attendants, lead agents, and customer sales and service agents, as well as the new official languages coordinators.

Air Canada's comments and action plan

Air Canada has always assessed the level of performance of its employees in applying Part IV of the *Official Languages Act*, although under the general umbrella of customer service delivery.

Air Canada will include key performance indicators identifying specific obligations under Part IV of the *Official Languages Act* in management performance plans. In addition, once the language policy and the Code of Conduct have been updated, all employees, including management, will be reminded of their responsibilities and the performance competencies they are expected to conform to.

Commissioner's comments

We are satisfied with the measures proposed to follow up on this recommendation.

RECOMMENDATION 7

The Commissioner of Official Languages recommends that, when negotiations begin, Air Canada fully examine all collective agreements for the Canadian Union of Public Employees and the National Automobile, Aerospace, Transportation and General Workers Union of Canada (CAW), including all letters of agreement relating to official languages, and make appropriate revisions that will enable Air Canada to fully comply with the requirements of Part IV of the *Official Languages Act*. In particular, Air Canada should negotiate with CAW to find an approach that will allow for greater flexibility in the assignment of bilingual agents to shifts and in service areas as well as in the number of bilingual agents required to provide Air Canada passengers with services of equal quality in English and French in all Canadian airports in which Air Canada has language obligations. All details relating to official languages should be included in the collective agreements.

Air Canada's comments and action plan

Air Canada is currently in the process of negotiating new collective agreements with all unions. In collective bargaining employers cannot impose any terms that are not agreed to by its unions. The General Manager, Linguistic Affairs, participated in and provided information during the negotiations with CUPE, CAW and the International Association of Machinists and Aerospace Workers to present the Commissioner's audit findings and explain to the unions Air Canada's obligations under Part IV of the *Official Languages Act*.

In the context of labour:

- The Labour Relations branch has been briefed on the Commissioner's recommendations pertaining to official languages;
- Any successful negotiated outcomes to the collective agreements will be included in Air Canada's business processes on official languages.

Commissioner's comments

We are satisfied with the measures taken and those to follow. We encourage Air Canada to continue to intervene with unions to ensure compliance with the requirements of Part IV of the Act.

OBJECTIVE 2

ENSURE THAT AIR CANADA PROVIDES SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES IN AIRPORTS IN WHICH IT HAS LANGUAGE OBLIGATIONS AND ON BOARD FLIGHTS ON DESIGNATED BILINGUAL ROUTES, AND THAT IT ACTIVELY OFFERS AND PROVIDES PASSENGERS WITH EFFECTIVE SERVICES IN BOTH OFFICIAL LANGUAGES.

RECOMMENDATION 8

The Commissioner of Official Languages recommends that Air Canada carry out an analysis of its bilingual service signage in all service areas in which passengers circulate, and subsequently establish consistent standards regarding the positioning of bilingual service pictograms and develop a monitoring mechanism that ensures compliance with these standards and with the *Official Languages Act*.

Air Canada's comments and action plan

In the overwhelming majority of instances, signage at the airports requires the approval of the airport authorities. This includes the right to add tent cards or signs on countertops. Air Canada's current airport signage is monitored through the Quality Assurance Division. The following measures, to be developed by year end, will ensure a more consistent approach.

Air Canada will regularly assess passenger demand for official languages and adjust service in airports and in flight accordingly. To be documented in its language business process:

- Develop standards, with airport authorities where required, for service in both official languages, which will include a standard for signage;
- Develop, document and implement auditing protocols for each service area.

Commissioner's comments

We are satisfied with the proposed measures.

RECOMMENDATION 9

The Commissioner of Official Languages recommends that Air Canada develop a strategy to ensure that flight attendants and customer sales and service agents understand the importance of bilingual greetings and that they make an active offer of services in both official languages on board aircraft and in airports where Air Canada has language obligations in order to comply with the requirements of the *Official Languages Act*.

Air Canada's comments and action plan

As mentioned previously, because it makes good commercial business sense to do so, Air Canada already has a number of tools to communicate the company's linguistic requirements and understands the need for effective ways to communicate.

As part of its documented business processes in support of official languages, by early next year Air Canada will:

- Develop standards for training, which will include the minimum training requirement in new and recurrent training for employees for them to understand their language obligations under Part IV of the *Official Languages Act*;
- Communicate its language policy and its obligations under Part IV of the *Official Languages Act* on a systematic and regular basis.

Commissioner's comments

We are satisfied with the proposed measures and timeframe.

RECOMMENDATION 10

The Commissioner of Official Languages recommends that Air Canada thoroughly examine:

- a) the number of bilingual service directors, flight attendants, lead agents, customer sales and service agents, and managers required to ensure that services of equal quality are provided in English and French inflight and in airports where Air Canada has language obligations across Canada, and
- b) the planning for the provision of bilingual services for all its activities, as well as the assignment of bilingual agents to various service areas (including the cockpit) in order to maximize its resources.

Air Canada's comments and action plan

Air Canada currently has a process in place to ensure there is always at least one bilingual flight attendant on board all flights, and that more bilingual employees are assigned for flights considered mostly French as allowed by the collective agreement.

In order to improve the available service of equal quality in both official languages in airports and on board flights, by the end of year Air Canada will:

- Conduct an analysis to review the minimum number of bilingual employees required in all service areas;
- Review training programs for front line employees;
- Document the business process.

Commissioner's comments

We are satisfied with the proposed measures and timeframe.

OBJECTIVE 3

ENSURE THAT AIR CANADA CONSULTS REPRESENTATIVES OF OFFICIAL LANGUAGE MINORITY COMMUNITIES IN THE VARIOUS REGIONS AND THAT IT TAKES THE RESULTS OF THESE CONSULTATIONS INTO CONSIDERATION WHEN PLANNING FOR THE PROVISION OF BILINGUAL SERVICES.

RECOMMENDATION 11

The Commissioner of Official Languages recommends that Air Canada consult official language minority communities in order to take their specific needs into account when making decisions that affect route planning and bilingual services. During its regular and formal consultations with various concerned parties, Air Canada should target national, provincial and regional representatives of official language minority communities and inform them of any decisions made.

Air Canada's comments and action plan

Air Canada does not share the Office of the Commissioner's interpretation of the Supreme Court Decision in *DesRochers v. Canada (Industry)* in that Air Canada would have an obligation to consult the national, provincial and regional representatives of the official language minority communities in a structured and coordinated manner to identify specific needs regarding how they would like to receive the services. Indeed, unlike the facts at the base of the *DesRochers* decision, Air Canada offers a service that is more in the nature of a "product." Unlike government institutions, as a private company, Air Canada does not provide consultative services or development services. More importantly, Air Canada is precluded under the *Canada Transportation Act* and the *Canadian Human Rights Act* to provide its services in a differentiated manner and is mandated to provide them consistently.

Be that as it may, Air Canada consults and participates with the language minority communities for special occasions or events such as the Vancouver Olympic Games, la Place de la Francophonie, les Rendez-vous de la Francophonie

and le Festival du Voyageur. It also consults with minority communities for recruiting activities. Air Canada is sensitive to community members' needs and is constantly looking at improving its service and meeting the needs of customers.

Air Canada proposes to enhance its communications with the national, provincial and regional representatives of the official language minority communities on an occasional basis, as part of its documented business processes, by the end of the year.

Commissioner's comments

We are partially satisfied with the follow-ups taken in response to this recommendation. Although Air Canada does not agree with our interpretation of the *DesRochers* decision, we maintain that air transportation services provided by Air Canada must be of "equal quality" for both official language communities that make up the travelling public. To fulfill this obligation, Air Canada must not only listen to the needs of community members, but must also take into account the needs of official language minority communities, particularly when making decisions that impact flights, routes or bilingual services. Consulting minority-language communities to provide services of equal quality to both official language communities, as required by the *Official Languages Act*, does not contravene the *Canada Transportation Act* or the *Canadian Human Rights Act*. We will in time examine the steps taken by Air Canada to consult the communities.

OBJECTIVE 4

ENSURE THAT AIR CANADA EFFECTIVELY MONITORS ITS PERFORMANCE IN THE DELIVERY OF SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES, IN THE AIR AND ON THE GROUND.

RECOMMENDATION 12

The Commissioner of Official Languages recommends that Air Canada institute structured monitoring mechanisms in order to ensure the availability and quality of services in both official languages in all its areas of activity, as well as those of Jazz, both inflight on designated bilingual routes and in airports where Air Canada has language obligations. Air Canada should take all necessary measures to address the shortcomings noted during the monitoring process and periodically report on results.

Air Canada's comments and action plan

Air Canada currently monitors the performance of its employees in applying Part IV of the *Official Languages Act* via various monitoring tools and surveys, for example by Ipsos Reid and other internal quality assurance programs.

In order to improve the monitoring mechanisms, by the end of the year Air Canada will:

- Review and modify the distribution of Ipsos Reid results to ensure appropriate personnel are aware of results;
- Review the current Mystery Shopper program to make it part of our language business process;
- Enhance the quality assurance program to ensure all service areas are covered, including Jazz and any other airline affiliated with Air Canada and the *Official Languages Act*;
- Ensure the monitoring and auditing process is part of the overall documented language business processes, including the reporting protocol.

Commissioner's comments

We are satisfied with the proposed measures and timeframe.

