



Office of the
Commissioner of
Official Languages

Commissariat
aux langues
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AUDIT

MANAGEMENT OF THE OFFICIAL LANGUAGES PROGRAM AT THE HALIFAX INTERNATIONAL AIRPORT AUTHORITY

FOLLOW-UP

December 2013



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In January 2010, the Office of the Commissioner of Official Languages published an audit report that examined the official languages program of the Halifax International Airport Authority. The audit, conducted between September 2007 and March 2008, addressed only the management of the official languages program, which was established to provide communications with and services to the travelling public (section 23 of the *Official Languages Act*).

The audit included nine recommendations to help the institution manage its official languages program. Those recommendations addressed senior management's leadership, as well as infrastructure and monitoring to support linguistic duality at the airport.

In July 2013, the Office of the Commissioner completed a follow-up of the measures taken by the institution to implement the audit recommendations. Our analysis found the following:

RECOMMENDATION 1 (Partially implemented)

The Commissioner recommends that the Halifax International Airport Authority strengthen its official languages accountability framework to include a description of the mechanisms used to meet its obligations under the *Official Languages Act*, a means of communicating this information to all employees and contracted service providers and a mechanism to encourage a more concerted and proactive approach to the official languages program in its various departments.

- The Airport Authority's official languages accountability framework refers in general terms to annual reminders of official languages obligations to air carriers and contracted service providers, and also refers in general terms to the administration of contracts for aeronautical and retail services to the travelling public.

To fully implement this recommendation, the institution should provide a more detailed accountability framework with the following:

- a description of the mechanisms used to meet official languages obligations;
- a means of communicating official languages obligations to all Airport Authority employees, not just contracted service providers; and
- a mechanism to encourage a more concerted and proactive approach to the official languages program in the Airport Authority's various departments.

RECOMMENDATION 2 (Partially implemented)

The Commissioner recommends that the Halifax International Airport Authority strengthen its action plan for official languages to include clear objectives, specific actions with timelines, areas of responsibility, performance indicators, a communications strategy and monitoring mechanisms to ensure compliance with its various obligations under the *Official Languages Act*. The implementation of the action plan should also be reviewed by the Executive Management Team on an annual basis.

- During the follow-up, the Airport Authority provided an updated action plan that replicated items listed in the Office of the Commissioner's 2007–2008 report card and that briefly noted some situations pertaining to official languages issues at the Airport Authority. However, to fully implement this recommendation, the plan should include areas of responsibility, performance indicators and monitoring mechanisms.
- In response to this recommendation, the Airport Authority is putting in place a compliance program for official languages, which the institution indicated will be completed by December 2013, as well as an official languages strategic roadmap. We look forward to reviewing the forthcoming official languages compliance document and the roadmap.

RECOMMENDATION 3 (Partially implemented)

The Commissioner recommends that the Halifax International Airport Authority:

- a) take appropriate measures to demonstrate in concrete, tangible ways its commitment to promoting linguistic duality and to raising the visibility of the official languages program among the airport's key occupants to ensure that they take full responsibility for the services they are required to provide to the travelling public in both official languages;
- b) develop an internal policy that clearly defines the Airport Authority's obligations and expectations with respect to bilingual services provided to the travelling public by its employees and by specific contracted service providers at the Halifax Stanfield International Airport.

- The visibility of official languages at the airport is being raised in part through the Airport Authority's Volunteer Program. According to the Airport Authority's volunteer reference manual, volunteers are expected to adhere to all policies and procedures that govern the institution and the Volunteer Program. The section on official languages states that the Airport Authority is obligated and committed to providing services in both official languages and that it is the Airport Authority's responsibility to ensure that any member of the public can communicate with and obtain available services (both orally and in writing) in the official language of their choice. New volunteers also attend a training session that includes the topic of official languages obligations.

We believe that the Airport Authority has taken steps to demonstrate its commitment to linguistic duality. However, we note from our own observations in fall 2012 of service to the public that the Airport Authority still has work to do in terms of its provision of active offer and services of equal quality in English and French.

- The Airport Authority upgraded its Web site in 2011 to provide multilingual access, including French. The institution indicated that it annually reviews and updates its Web site to ensure that all information is provided in both official languages.

The Airport Authority reported that the Halifax Airport Merchants Association continues to serve as an informal venue for airport merchants to discuss a variety of matters, including official languages as they pertain to the travelling public.

In addition, the Airport Authority placed posters about official languages, provided by the Nova Scotia Official Languages Committee, in appropriate areas of the airport to encourage employees to speak in their preferred official language.

We believe that these initiatives are a step in the right direction.

- The second half of recommendation 3 called on the Airport Authority to develop an internal policy that clearly defines the institution's obligations and expectations with respect to bilingual services provided to the travelling public by its employees and by specific contracted service providers at the Halifax Stanfield International Airport.

The Airport Authority indicated that its internal policy regarding official languages is contained in documents such as its work plan, action plan, communications strategy and accountability framework. However, we noted that references to official languages in these documents need to be more precise and that the institution did not develop a separate internal official languages policy.

The Airport Authority still needs to develop and implement an official languages policy and directives that take into account how services are provided in an airport environment. They should cover all of the institution's responsibilities as set forth in Part IV of the Act. This new policy will facilitate compliance with and ensure effective implementation of the Act. It should be approved by senior management, communicated to all staff and reviewed periodically.

We believe that a separate document devoted to the internal policy would formalize the institution's current actions under its official languages program, as it has done with its airport community culture program, the Stanfield Way, mentioned later in this report.

The development and implementation of an internal policy on official languages would be a step toward full implementation of recommendation 3.

RECOMMENDATION 4 (Satisfactorily implemented)

The Commissioner recommends that the Halifax International Airport Authority develop a communications strategy aimed at raising awareness of its official languages obligations among specific contracted service providers throughout the airport. A key component of the strategy should be a highly visible awareness campaign on the responsibilities and obligations linked to the provision of active offer and delivery of services in both official languages, accompanied by the necessary tools to help them fulfill these obligations.

- The Airport Authority developed a communications strategy and finalized it in 2011. The communications strategy has limited details; however, the institution raises awareness of its official languages obligations through its Volunteer Program. The program has a reference manual for volunteers that outlines their official languages obligations to the public. As mentioned previously, new volunteers also attend a training session that includes an official languages component. New employees are made aware of official languages obligations via a workshop on the Stanfield Way.

According to the Airport Authority's employee orientation handbook, the Stanfield Way is an airport community culture program designed to formalize and articulate the culture of its airport community and is intended to help everyone at the airport better serve its passengers and visitors. The related orientation handbook also mentions that it assists in the education of employees on the services and programs available at the airport. Similar to the volunteer reference manual, the employee orientation handbook has a section on official languages.

Regarding awareness activities, the institution indicated that volunteers are informed of responsibilities and obligations regarding active offer and delivery of services in both official languages. Volunteers are given laminated cards with key phrases that enable them to direct those in need to the Visitor Information Centre, where bilingual staff members are available.

The Airport Authority also stated that it reminds merchants about their official languages obligations. The institution gives them information on who to contact regarding available official languages services. This information has been confirmed with the Halifax Airport Merchants Association.

We believe that these initiatives to raise awareness of official languages obligations at the airport are satisfactory measures.

RECOMMENDATION 5 (Not implemented)

The Commissioner recommends that the Halifax International Airport Authority add provisions to contracts with specific service providers that clearly outline incentives for compliance or consequences of non-compliance with respect to official languages obligations.

- The Airport Authority indicated that it prefers to take a cooperative and respectful approach rather than imposing consequences in cases of non-compliance. We understand this cooperative approach; however, the Airport Authority should look at innovative ways to recognize the accomplishments of contracted service providers pertaining to official languages as a means to encourage compliance with official languages obligations.

RECOMMENDATION 6 (Partially implemented)

The Commissioner recommends that, in the interest of providing quality services in both official languages to all travellers throughout their entire visit at the Halifax Stanfield International Airport, the Halifax International Airport Authority take the lead and establish a joint working group with other federal institutions located at the airport to regularly discuss and address official languages issues.

- We confirmed that the Airport Authority actively participates in the Nova Scotia Official Languages Committee, along with many of the federal institutions at the airport. The Airport Authority uses this venue as a stepping stone to engage other federal institutions in informal discussions about official languages. By ensuring that these informal discussions happen on a regular basis with set timelines the Airport Authority would be taking appropriate steps to fully implement this recommendation.

RECOMMENDATION 7 (Satisfactorily implemented)

The Commissioner recommends that the Halifax International Airport Authority review the language designation of its positions so that a sufficient number of bilingual positions exist to ensure the availability of services in both official languages, and that the travelling public can communicate with the Airport Authority in the official language of its choice. At the same time, this review should also address language training and recruitment needs.

- The institution conducted a review of the language designation of its positions and found that the customer relations assistant comes into contact with the travelling public. As a result, the institution hired a bilingual customer relations assistant in 2009, and the corporate paralegal employee has participated in French-language training since 2010. The Airport Authority also indicated that several employees are bilingual and can be called on to assist in providing services in both official languages.

The Airport Authority also noted that it plans to look for people with other language skills, including French, during its next volunteer recruitment in 2013.

RECOMMENDATION 8 (Partially implemented)

The Commissioner recommends that the Halifax International Airport Authority:

- a) implement formal mechanisms for the effective and efficient monitoring of compliance with the *Official Languages Act* from all contracted service providers at the Halifax Stanfield International Airport that are required to provide their services in both official languages;
- b) develop and implement innovative measures to encourage contracted service providers to meet their official languages obligations.
 - The Airport Authority noted that it has not fully implemented this recommendation. It acknowledged that more formal mechanisms for compliance monitoring are appropriate, and the institution intends to address the issue in its planned review of the official languages program.

In this regard, the upcoming official languages compliance program mentioned in recommendation 2 also addresses this recommendation. We look forward to reviewing the official languages compliance document.

RECOMMENDATION 9 (Satisfactorily implemented)

The Commissioner recommends that the Halifax International Airport Authority use its community consultative committee and outreach program as an opportunity to create a dialogue with the representatives of the official language minority community and discuss issues related to official languages at the Halifax Stanfield International Airport as well as potential solutions.

- The institution uses its community outreach program to support events in the Francophone community. The institution also initiated a dialogue with representatives of the Francophone community in January 2010, which it maintains.

Since 2008, the Airport Authority has had a member of the Francophone community on its community consultative committee.

CONCLUSION

The Commissioner of Official Languages is satisfied with the Halifax International Airport Authority's efforts to implement recommendations 4, 7 and 9. However, he is only partially satisfied with the efforts on recommendations 1, 2, 3, 6 and 8. The institution must implement recommendation 5 in order to improve the management of the official languages program for providing communications with and services to the travelling public.

Although we are encouraged by a few of the measures the Airport Authority has adopted to improve the overall management of its official languages program, as well as the leadership and commitment that the institution has shown in certain areas of official languages, it can still do much more to fully implement the recommendations of the January 2010 audit.

We maintain that the Airport Authority must look at innovative ways to encourage contracted service providers to meet their official languages obligations.

The Commissioner believes that the Airport Authority can improve its measures to fully implement the recommendations it has so far only partially implemented. The institution should review the one recommendation it has not implemented, and it should formulate a stronger action plan and timeline with a clearer set of objectives, planned actions and desired outcomes for all recommendations that have not been fully implemented.

Since much work remains to be done, we ask that the Airport Authority produce, in the six months following the publication of this follow-up report, an action plan that includes deadlines for the implementation of recommendations 1, 2, 3, 5, 6 and 8.