



Office of the
Commissioner of
Official Languages

Commissariat
aux langues
officielles

AUDIT

OF THE DELIVERY OF BILINGUAL SERVICES
TO VISITORS BY PARKS CANADA

FOLLOW-UP
September 2016



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In September 2012, the Office of the Commissioner of Official Languages published its audit report on bilingual service delivery to Parks Canada visitors. The audit was conducted at Parks Canada headquarters and included on-site visits to a number of national parks, national marine conservation areas and national historic sites. Following the audit, the Commissioner of Official Languages made nine recommendations to help the Agency improve the experience of visitors who wish to be served in the official language of their choice, as is their right under Part IV of the *Official Languages Act* (the Act). The audit recommendations and the findings of the audit follow up are listed in Appendix A.

The Commissioner's recommendations focused on the following four objectives:

- Ensure that Parks Canada senior management is committed to implementing Part IV of the Act in order to provide visitors with services of equal quality in both official languages.
- Ensure that Parks Canada provides the active offer and services of equal quality in English and French to the public at all of its sites and ensure that the provision of bilingual services is planned effectively.
- Ensure that Parks Canada consults representatives of official language minority communities in the various regions and takes the results into consideration when planning for the provision of bilingual services.
- Ensure that Parks Canada is effectively monitoring the quality of service delivery in both official languages at all of its service points.

In December 2014, the Office of the Commissioner of Official Languages initiated a follow-up to the audit in order to evaluate and document the measures taken by Parks Canada to implement the Commissioner's recommendations.

METHODOLOGY

The results of the audit follow-up are based on an examination of the progress report and action plan submitted by Parks Canada in response to the recommendations made in the initial audit, and on an analysis of the supporting documents provided by Parks Canada and of the information obtained during interviews.

In April and May 2015, meetings were held with the Director of the Workforce Engagement and Contribution Directorate and with representatives of the Human Resources Directorate. Interviews were conducted with former members of the Advisory Committee on Official Languages. In April and May 2016, the Office of the Commissioner received a number of additional documents in response to the preliminary audit follow-up report. E-mail exchanges and conversations subsequently took place between the senior auditor and official languages representatives from Parks Canada.

ANALYSIS OF FINDINGS AND RECOMMENDATIONS

OBJECTIVE 1

ENSURE THAT PARKS CANADA SENIOR MANAGEMENT IS COMMITTED TO IMPLEMENTING PART IV OF THE OFFICIAL LANGUAGES ACT IN ORDER TO PROVIDE VISITORS WITH SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES.

OFFICIAL LANGUAGES ACCOUNTABILITY FRAMEWORK

RECOMMENDATION 1

The Commissioner of Official Languages recommends that Parks Canada:

- a) develop and implement an accountability framework for official languages that clearly defines all of its obligations. This framework must also include coordination mechanisms and indicate how those responsible in the various field units (and service centres) will be held accountable. The framework must be approved by senior management and effectively communicated to all employees;
- b) clarify the role and responsibilities of the National Resourcing Programs Unit and establish a formal network of official languages coordinators, including terms of reference. The information and documentation from the network's meetings and consultations should be properly archived.

In November 2014, Parks Canada developed the *Performance Measurement Strategy for Bilingual Communications and Services to the Public (Part IV)*, which was approved by the Executive Committee. The Strategy includes a management and accountability framework focused on results relating to Part IV of the Act. It sets out a clear governance structure—including the role of the Workforce Diversification Programs Unit (formerly the National Resourcing Programs Unit) and the External Relations and Visitor Experience Directorate—and outlines the official languages responsibilities of senior executives, managers and employees. The Strategy does not, however, describe the accountability process.

The *Performance Measurement Strategy for Bilingual Communications and Services to the Public (Part IV)* presents a logical model that provides for activities, each of which has performance indicators for bilingual communications and services, for the responsibilities of managers and employees, for the needs of official language minority communities and for public satisfaction. According to Parks Canada, these activities are measured through

data collection and analysis, through performance reports and through results accountability on both operational and functional levels. Our analysis of this document revealed that Parks Canada provides only a vague description of current or future activities that will help meet objectives. The Agency also fails to specify the methodology and mechanisms established to implement the proposed measures. In April 2015, all employees were informed by e-mail of the Strategy, which is posted on the intranet.

Problems were also identified regarding the information presented in the progress report, which refers to “designated bilingual offices.” In order to meet the obligations under subsection 24(1)(a) of the Act and under subsections 9(a), (b) and (c) of the *Official Languages (Communications with and Services to the Public) Regulations* (the Regulations), Parks Canada is required to provide bilingual services throughout its entire network, with the exception of the four offices that are not subject to the *Canada National Parks Act*. Those offices are subject to the same obligations that apply generally under the Regulations. At the time of writing this report, Parks Canada, in consultation with the Treasury Board of Canada Secretariat, was in the process of assessing the level of demand for bilingual services at these four offices to determine whether services need to be provided in both official languages.

During the follow-up to our audit and following a reorganization within Parks Canada, the Chief Human Resources Officer and Official Languages Champion set up a new official languages advisory committee made up of representatives from the five new operation sectors. The Champion also established a discussion forum on the intranet to obtain ideas on improving bilingualism within the Agency. We applaud Parks Canada's commitment and involvement in the production of the *Beaver's Den* videos. Moreover, representatives from the division responsible for official languages at Parks Canada now sit on the Treasury Board of Canada Secretariat's Crown Corporations Advisory Committee on Official Languages.

With regard to the creation of a formal network of official languages coordinators, Parks Canada decided to expand the mandate of its network of 30 managers responsible for human resources within the field units. We were advised that the network is used to discuss official languages, among other things. However, we have not received the committee's terms of reference or any information on the roles and responsibilities of its members, nor have we received the reporting arrangements for this working group. We are of the opinion that Parks Canada should take the necessary steps to make official languages a regular item on the agenda at the meetings of this committee to ensure that official languages are promoted and to raise awareness of their importance. In addition, the Agency should ensure that the members of the network monitor the active offer of bilingual services and related services in English and French at all its offices and sites in Canada. The network should also foster

discussions on challenges and best practices so that problems can be resolved quickly.

Parks Canada has implemented Recommendation 1.

OFFICIAL LANGUAGES ACTION PLAN

RECOMMENDATION 2

The Commissioner of Official Languages recommends that Parks Canada establish and implement a new official languages action plan that includes specific measures regarding its visitor communications activities so that it can ensure services of equal quality in English and French. This plan must include timeframes, performance indicators and an accountability mechanism. Parks Canada must also establish and implement a monitoring mechanism for the official languages action plan.

Parks Canada developed a document entitled *Parks Canada Agency's Official Languages Directions and Priorities 2014–2017*, which sets out the Agency's obligations under all parts of the Act and its desire to refocus its official languages program in order to "standardize the way in which it complies with the Act" and to "strengthen its tools to help managers determine the areas for improvement as well as meet their official languages obligations." It specifies that the Workforce Diversification Programs Unit of the Workforce Engagement and Contribution Directorate in the Human Resources Directorate is responsible for implementing these priorities.

This document also describes Parks Canada's vision with respect to its commitment to official languages. However, it does not contain specific measures regarding Parks Canada's visitor communications activities to ensure that services of equal quality are provided in English and French. Moreover, it does not contain any timeframes, performance indicators or accountability mechanisms. Parks Canada was also supposed to establish and implement a monitoring mechanism for the action plan.

As part of this audit follow-up, a connection was made between this document and the *Performance Measurement Strategy for Bilingual Communications and Services to the Public (Part IV)*, in which "program outputs and results" are vaguely described. The objectives state that the management units will produce regional official languages plans by March 31, 2017. In our opinion, this timeframe is unreasonable, and it will not be possible to obtain concrete results in the field quickly enough, given that our initial audit was conducted in 2012.

In light of the foregoing, we have concluded that Parks Canada did not establish concrete measures to correct the shortcomings described in the audit report in terms of specific activities, including those related to the various interpretive programs within its network. Parks Canada did not set any specific timeframes for key activities. We had been expecting to receive a detailed action plan, approved by senior management, setting out specific measures to implement the Commissioner's recommendations. We had also been expecting Parks Canada to establish specific measures to address the shortcomings identified in its 2015 review of bilingual service delivery to visitors and the bilingual capacity of management units within its network, described later in this report.

We are of the opinion that Parks Canada needs to establish and quickly implement a new official languages action plan that includes specific measures, realistic timeframes, an accountability mechanism and a monitoring mechanism.

Parks Canada has not implemented Recommendation 2.

RECOMMENDATION 3

The Commissioner of Official Languages recommends that Parks Canada develop an official languages policy that takes its activities and programs into account and includes all of the components of Part IV of the *Official Languages Act*. This policy must reflect the Agency's new structure in terms of the visitor experience and refer to the *DesRochers* decision, particularly the principles related to equal access and services of equal quality. Parks Canada must also develop a communications strategy to effectively communicate the policy to all employees.

Parks Canada has maintained the status quo by continuing to follow the Treasury Board of Canada Secretariat's official languages policy and directives. However, in the action plan that it proposed during the initial audit, Parks Canada had committed to review, update and adapt its official languages policies and guidelines. Instead, it chose to quote subsection 46(1) of the Act: "the Treasury Board has responsibility for the general direction and coordination of the policies and programs of the Government of Canada relating to the implementation of Parts IV, V and VI in all federal institutions." Although institutions may use the framework documents developed by the Treasury Board of Canada Secretariat as a model, this does not prevent Parks Canada from developing its own framework documents in order to better reflect its activities and ensure a better understanding of its obligations.

It is important to note that the Treasury Board of Canada Secretariat's *Directive on Official Languages for Communications and Services* refers to "designated offices," a concept that does not apply to Parks Canada, as has already been stated in this report (except for the four offices that are not subject to the *Canada National Parks Act*). This might confuse Parks Canada managers and employees with regard to their obligations.

At the time of this audit follow-up, Parks Canada had not developed a strategy to effectively communicate its language requirements to all employees. The Official Languages Champion sent two e-mails to employees informing them of the Rendez-vous de la francophonie and new language tools (second language self-assessment tests and a series of language-related articles). However, these communications did not inform Parks Canada employees of the Agency's obligations with regard to delivering services of equal quality in English and French to visitors.

Parks Canada has not implemented Recommendation 3.

RECOMMENDATION 4

The Commissioner of Official Languages recommends that Parks Canada amend its performance management procedures by including a provision on the implementation of Part IV of the *Official Languages Act* in the performance evaluations of managers, team leaders and any other employees who are required to communicate with the public in both official languages and who negotiate service agreements with third parties.

Parks Canada's *Performance Measurement Strategy for Bilingual Communications and Services to the Public (Part IV)* stipulates that the Agency's Chief Executive Officer and Executive Committee are responsible for implementing policies, direction, priorities and strategies. It also states that delegated managers, including Visitor Services managers, human resources managers and bilingual employees, have official languages responsibilities.

Parks Canada has taken a step in the right direction by creating the 2016–2017 *PCX Mandate Letter* template for field units to evaluate the performance of managers at the PCX level. An official languages objective has been added to the evaluation report under "Part B – Human Resources Management." However, in the template, the commitment related to official languages is combined with a commitment concerning employment equity, and this poses a problem. Official languages objectives need to be presented and evaluated separately, and they need to specify the obligations regarding visitor communications (Part IV) and other parts of the Act so that all of the official languages objectives are evaluated. The Agency did not provide further details or performance evaluation reports for employees, including front-line staff, who have official languages obligations, or for people working in field units across Canada who negotiate agreements with third-party providers.

Parks Canada has partially implemented Recommendation 4.

SERVICE AGREEMENTS WITH THIRD PARTIES

RECOMMENDATION 5

The Commissioner of Official Languages recommends that Parks Canada include in its new service agreements, as well as in those that are being renewed, specific language clauses that reflect the provisions of Part IV in order to fully comply with the *Official Languages Act*.

In the initial audit, Parks Canada committed to including a language clause in its service agreements with third parties acting on its behalf so that it could ensure service delivery in both official languages. We requested copies of agreements signed since 2012 and, even though the Agency's various field units deal with a number of third-party providers, we received only six service agreements, all of which were for the Atlantic region. We had been expecting to receive a sample of agreements from various regions in Canada in order to assess the implementation of the recommendation. However, we are satisfied with the language clauses in the sample of agreements that we did receive. During the follow-up, the Agency reported that it had added a new document entitled *Contracting Checklist – Official Languages Obligations* to its guide for establishing agreements. This document is intended to help managers incorporate the Agency's official languages obligations into agreements that they sign with third-party providers.

In light of the limited sample that we received, we encourage Parks Canada to ensure that all agreements for visitor services with third parties include an acceptable language clause and to make a clear commitment in this regard.

Parks Canada has partially implemented Recommendation 5.

OBJECTIVE 2

ENSURE THAT PARKS CANADA PROVIDES THE ACTIVE OFFER AND SERVICES OF EQUAL QUALITY IN ENGLISH AND FRENCH TO THE PUBLIC AT ALL OF ITS SITES. ENSURE THAT THE PROVISION OF BILINGUAL SERVICES IS PLANNED EFFECTIVELY.

PLANNING FOR THE PROVISION OF BILINGUAL SERVICES AND INTERPRETIVE PROGRAMS

RECOMMENDATION 6

The Commissioner of Official Languages recommends that Parks Canada:

- a) conduct an in-depth review of the planning for the provision of bilingual services at all national parks, national marine conservation areas and national historic sites, as well as the assignment of interpreters and attendants to Visitor Services, and implement as soon as possible the necessary effective measures to comply with the requirements of the *Official Languages Act*;
- b) review the activities and interpretive programs of all of its field units to ensure that they are available in both official languages. Notices of activities and interpretive programs must indicate the language in which they will be held so that services are of equal quality and members of the public can communicate in the official language of their choice.

In March 2015, Parks Canada reviewed the planning for the provision of bilingual services to visitors at all national parks, marine conservation areas and national historic sites. We received the report detailing the results of this exercise.

Parks Canada conducted telephone consultations with 66 managers in the Visitor Experience Branch who are responsible for interpretive programs and services across Canada. The managers were asked to answer eight specific questions. The objective of this consultation exercise was to help determine whether Parks Canada has enough bilingual employees to ensure service delivery in English and French, whether interpretive programs are offered in both official languages, how to address the challenge of providing bilingual services consistently and how to improve bilingual service delivery.

The results of the review echoed much of the information and many of the observations in our audit report, including the fact that planning for the provision of bilingual services is a source of concern. In fact, an analysis of the results showed that only 51% of sites always had enough bilingual staff to ensure service delivery in both official languages during all hours of operation. The analysis also showed that 35% of sites sometimes had enough bilingual staff and that 14% of sites did not have bilingual staff.

The analysis revealed that in 76% of cases, employees working at entrance points or visitor centres must ask for assistance from a bilingual colleague, supervisor or manager on site or seek assistance by telephone. This clearly shows a lack of bilingual capacity to provide services of equal quality in English and French after visitors have been greeted with “Hello! Bonjour!”.

With respect to interpretive programs offered to visitors in both official languages, 35% of respondents said that all of their programs are offered in both official languages at all times. However, 32% of Visitor Experience managers said that their programs are offered in both official languages only on request, and 33% of respondents said that only some of their programs are offered in the language of the linguistic minority in their region. These results are a cause for concern because they show that in a good number of cases, French-speaking visitors do not have access to interpretive services of equal quality in their first official language.

Parks Canada is planning to implement several measures that we think should help rectify this situation: staffing bilingual positions, sharing best practices, training managers, providing second-language training to staff and giving advice and support for planning interpretive programs. However, we noted that some of these measures will not be implemented until 2016–2017. We believe that the timeframes should have been shorter to correct the identified shortcomings more promptly. Parks Canada will need to review these measures, include them without delay in its three-year official languages plan and provide for the establishment of an accountability and monitoring mechanism.

Parks Canada has implemented Recommendation 6.

LANGUAGE SKILLS AND BILINGUAL CAPACITY

RECOMMENDATION 7

The Commissioner of Official Languages recommends that Parks Canada ensure that employees who are required to communicate with the public have language skills that reflect the realities and requirements of their positions in terms of the Agency’s official languages operational obligations. Moreover, the Agency must conduct an in-depth review of the bilingual skills of all of its employees to verify that there is sufficient capacity to provide services of equal quality in English and French.

The audit follow-up showed that Parks Canada has not reviewed to what extent employees’ language skills reflect the reality and operational requirements of their positions in terms of official languages. Doing this would have enabled the Agency to identify the language skills necessary to ensure that visitor services are of equal equality and make any necessary changes to the linguistic profiles of positions.

It is important to note that manager and staff positions have generic work descriptions. However, the linguistic profiles of identical bilingual positions on the same team and in the same field unit vary, and this may have a negative impact on the quality of services provided to the public in English and French.

With respect to the second part of the recommendation, Parks Canada carried out an analysis of its bilingual capacity in all field units. This was done by conducting a study to verify that employees who communicate with the public meet the language requirements of their position. The study also included a review of the capacity to provide services in English and French at all Parks Canada offices and sites.

The results of the study showed that 55 (or 7%) of the 830 employees who hold positions identified as bilingual do not meet the language requirements of their position. The 55 employees are spread out over 20 field units across Canada. Parks Canada claimed that in most cases, the problem stems from a poor understanding or application of official languages policies and directives. It also stated that second language evaluations in oral proficiency had had to be delayed because of operational needs. In 2016, Parks Canada continued to update its electronic system and reported that the percentage of employees who do not meet the language requirements of their position had dropped to 4%.

Parks Canada proposed three measures to follow up on the first phase of its analysis and to rectify the situation with respect to the 55 employees who do not meet the language requirements of their position. It asked business unit managers to prepare action plans to address the problems and made them responsible for providing an update on the situation. Managers and employees will receive training sessions and information bulletins to improve their understanding and interpretation of official languages policies and directives. The training sessions will cover staffing bilingual positions, maintaining bilingual capacity, assessing linguistic profiles and considering operational needs and the position's duties when establishing language requirements. At the time of writing this report, some supervisors had received a presentation on the HR 101 tool. However, it was not indicated whether existing employees had received training.

Parks Canada also developed a draft personnel management dashboard that includes an official languages component. This tool should enable management unit directors to monitor linguistic profile compliance and the ratio of bilingual employees in the management units.

We are satisfied with the timeframes established to implement these measures, except for the March 31, 2017, date by which information is to be provided to managers. Parks Canada needs to review this timeframe and ensure that its managers receive this information more quickly.

The second phase of Parks Canada's analysis reviewed its capacity to provide services in English and French at all of its sites. The Agency also used this opportunity to review its Human Resources Management System and found coding problems that had resulted in bilingual employees who must serve visitors being identified as unilingual employees. Other problems were also found: different language requirements for different languages and no justification for the disparity; managers' lack of understanding of their official languages responsibilities; and the difficulty of recruiting bilingual employees because of the seasonal nature of the positions and the remoteness of the locations.

The review also found that, at slightly over half of the sites, less than 30% of the positions were bilingual and that 11 Parks Canada offices did not have any bilingual capacity.

Parks Canada stated that it had reviewed the sites identified in the Treasury Board of Canada Secretariat's Burolis directory as providing bilingual services to the public. However, we noted some irregularities in the data provided by the Agency. For example, Burolis lists 180 sites for Parks Canada, but the Parks Canada Web site shows that there are 223 sites, including national parks, national marine conservation areas and national historic sites. As mentioned at the beginning of this report, Parks Canada is required to provide services of equal quality in English and French throughout its entire network, except for the four offices that are currently being assessed. The Agency therefore needs to update Burolis as soon as possible.

Parks Canada proposed three measures to rectify the problems identified in the second phase of its analysis. First, it will verify the accuracy of the information in its Human Resources Management System and ensure that reports are sent to the managers of each business unit so that they can review specific data and confirm that all employee files have the correct office codes. Second, it will provide training to managers and employees to ensure that they understand Parks Canada's official languages requirements. Third, it will conduct research on best practices for staffing bilingual positions, taking into account the seasonal nature of the positions, and consult with managers on what measures could be taken to improve bilingual service delivery to the public and what tools could be used to help them enhance their official languages program.

We are satisfied with the measures and timeframes proposed by Parks Canada for the second part of the recommendation, except for the training for managers and employees, which should be given sooner. Here again, we would like to remind the Agency that the measures proposed to follow up on both phases of the analysis must be included in its official languages action plan and accompanied by an accountability and monitoring mechanism.

Parks Canada has partially implemented Recommendation 7.

OBJECTIVE 3

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

CONSULTATIONS WITH OFFICIAL LANGUAGE MINORITY COMMUNITIES

RECOMMENDATION 8

The Commissioner of Official Languages recommends that Parks Canada develop a mechanism for regular and formal consultations of national, provincial and regional representatives of official language communities. He also recommends that Parks Canada take the specific needs of these communities into account when developing its activities, programs and services for visitors.

Under Parks Canada's new *Performance Measurement Strategy for Bilingual Communications and Services to the Public (Part IV)*, its External Relations and Visitor Experience Directorate is responsible for consulting with official language minority communities to ensure that they are included and that their needs are taken into account during program and activity planning. We did not receive any information on the consultation methods for official languages. Simply giving a directorate the responsibility of consulting with official language minority communities and adding a map showing the location of these communities in the *Directive on Management Planning and Reporting* does not constitute a formal consultation mechanism. Rather, a consultation mechanism should include the designation of employees who are specifically responsible for conducting organized, structured consultations. The information received from Parks Canada states that the Agency "continues to informally consult the [communities]," which does not address the recommendation with respect to the development of a formal (structured and organized) mechanism for consultations. Moreover, this approach does not ensure that the needs of official language minority communities are taken into account, contrary to what is stated in the "Immediate Expected Results" section of the logic model in Parks Canada's *Performance Measurement Strategy for Bilingual Communications and Services to the Public (Part IV)*.

Parks Canada did not provide detailed information or documents to show that it had established—as part of the development of activities, programs and services to visitors—a formal mechanism to take the specific needs of official language minority communities into account through regular, formal interactions with community representatives at the national, provincial and regional level. The Agency reiterated that it holds public consultations every five years and that its *Guidelines for Management Planning and Reporting* refer to the *Official Languages Act*. The fact that this document states that "documents related to consultations must comply with the Federal Identity Program and the *Official Languages Act*, which stipulates that every person must be able to give their opinion on the same documents in the official language of their choice [translation]" does not mean that Parks Canada has addressed this recommendation. The Guidelines do not state that official language minority communities are consulted separately. Parks Canada's consultation process applies to the Canadian public in general. Its practices are therefore not sufficient to be considered as having addressed this recommendation.

However, Parks Canada carried out an evaluation of its programs and services to determine whether it meets the principle of substantive equality, further to the Supreme Court's decision in *DesRochers v Canada (Industry)*. It found that 2% of its programs and services could have an impact on this principle. It should be noted that no detailed information was received to substantiate this exercise in terms of methodology, consultation processes (non-existent for official language minority communities) or action items for the 2% of programs and services identified. The Agency will have to ensure adequate follow-up to complete this exercise.

Parks Canada has not implemented Recommendation 8.

OBJECTIVE 4

ENSURE THAT PARKS CANADA IS EFFECTIVELY MONITORING THE QUALITY OF SERVICE DELIVERY IN BOTH OFFICIAL LANGUAGES AT ALL OF ITS SERVICE POINTS.

EVALUATION FRAMEWORK AND MONITORING MECHANISM

RECOMMENDATION 9

The Commissioner of Official Languages recommends that Parks Canada establish an evaluation framework for the implementation of Part IV of the *Official Languages Act*, implement an appropriate monitoring mechanism and evaluate all of its services related to bilingual service delivery as well as those offered by third parties. The Agency must take necessary measures in the event of non-compliance.

During the initial audit, Parks Canada committed to establishing a monitoring and evaluation plan for Part IV of the Act. In its *Performance Measurement Strategy for Bilingual Communications and Services to the Public (Part IV)*, the Agency states that its Office of Internal Audit and Evaluation conducts regular audits and evaluations of programs and activities based on a process and schedule established in annual risk-based internal audit and evaluation plans. In its multi-year internal audit plans for 2014–2015 to 2016–2017 and 2015–2016 to 2017–2018, Parks Canada was planning on conducting an internal audit on its responsibilities under the Act with respect to identifying, maintaining and staffing bilingual positions as well as creating a work environment conducive to the use of both official languages. In May 2016, we were informed that this internal audit had been postponed because of other priorities. However, the Office of Internal Audit and Evaluation is monitoring our audit activities as well as the follow-up. It has organized meetings with key individuals at the Agency to confirm the implementation of the recommendations.

Parks Canada stated that the Workforce Diversification Programs Unit periodically follows up on official languages program activities and that the Visitor Experience Branch monitors visitors' satisfaction on site by conducting a survey on services provided in the official language of their choice. In its 2015 final report, the Branch stated that 17% of visitors had responded to the survey in French. The survey report and Parks Canada's 2013–2014 *Departmental Performance Report* show that 98% of visitors surveyed were satisfied with the service received in the official language of their choice. It should be noted that this survey is conducted every five years and that the results are based on a small number of sites surveyed each year. Parks Canada did not provide information on how it monitors services provided in English and French to visitors at various sites during the four years in between official surveys.

Parks Canada stated that delegated managers, including Visitor Experience managers, are responsible for ensuring that third parties provide services in both official languages and for taking the corrective measures necessary to ensure compliance. However, it was not possible for us to verify this information, because no supporting documents were provided. In addition, we did not receive any detailed information or documentation to show that there is an evaluation framework for the implementation of all of the components of Part IV of the Act or any other monitoring mechanisms to evaluate all of the services related to bilingual service delivery, such as interpretive programs, tours and campgrounds. In its response to the preliminary audit follow-up report, Parks Canada stated that it was planning to use "mystery shoppers" to assess bilingual services provided to visitors. We commend Parks Canada on this future initiative and encourage it to assess the services provided by third parties at the same time.

Parks Canada has not implemented Recommendation 9.

CONCLUSION

Audit follow-ups are as important as the audits themselves because they evaluate the extent to which the audited institutions have made the changes recommended in the audit reports or confirm that the institutions have committed to doing so. This follow-up showed that the creation of a new official languages team and the adoption of measures that were recently or are currently being established are promising. However, Parks Canada still has work to do, since it has not fully executed the action plan it submitted to us. It is important to note that we had been satisfied with the action plan that Parks Canada had proposed at the time of the initial audit, on the condition that the measures described in the plan were implemented at the time of the audit follow-up. The Commissioner is satisfied with the implementation of recommendations 1 and 6 and only partially satisfied with the implementation of recommendations 4, 5 and 7. The Commissioner has concluded that recommendations 2, 3, 8 and 9 have not been implemented.

In light of the disappointing results of this follow-up, the Office of the Commissioner of Official Languages intends to continue its intervention with Parks Canada to ensure that it fully implements the seven remaining recommendations.

AUDIT TEAM

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APPENDIX A

RECOMMENDATIONS TO PARKS CANADA AND OUR ASSESSMENT

RECOMMENDATION 1 (IMPLEMENTED)

The Commissioner of Official Languages recommends that Parks Canada:

- a) develop and implement an accountability framework for official languages that clearly defines all of its obligations. This framework must also include coordination mechanisms and indicate how those responsible in the various field units (and service centres) will be held accountable. The framework must be approved by senior management and effectively communicated to all employees;
- b) clarify the role and responsibilities of the National Resourcing Programs Unit and establish a formal network of official languages coordinators, including terms of reference. The information and documentation from the network's meetings and consultations should be properly archived.

RECOMMENDATION 2 (NOT IMPLEMENTED)

The Commissioner of Official Languages recommends that Parks Canada establish and implement a new official languages action plan that includes specific measures regarding its visitor communications activities so that it can ensure services of equal quality in English and French. This plan must include timeframes, performance indicators and an accountability mechanism. Parks Canada must also establish and implement a monitoring mechanism for the official languages action plan.

RECOMMENDATION 3 (NOT IMPLEMENTED)

The Commissioner of Official Languages recommends that Parks Canada develop an official languages policy that takes its activities and programs into account and includes all of the components of Part IV of the *Official Languages Act*. This policy must reflect the Agency's new structure in terms of the visitor experience and refer to the *DesRochers* decision, particularly the principles related to equal access and services of equal quality. Parks Canada must also develop a communications strategy to effectively communicate the policy to all employees.

RECOMMENDATION 4 (PARTIALLY IMPLEMENTED)

The Commissioner of Official Languages recommends that Parks Canada amend its performance management procedures by including a provision on the implementation of Part IV of the *Official Languages Act* in the performance evaluations of managers, team leaders and any other employees who are required to communicate with the public in both official languages and who negotiate service agreements with third parties.

RECOMMENDATION 5 (PARTIALLY IMPLEMENTED)

The Commissioner of Official Languages recommends that Parks Canada include in its new service agreements, as well as in those that are being renewed, specific language clauses that reflect the provisions of Part IV in order to fully comply with the *Official Languages Act*.

RECOMMENDATION 6 (IMPLEMENTED)

The Commissioner of Official Languages recommends that Parks Canada:

- a) conduct an in-depth review of the planning for the provision of bilingual services at all national parks, national marine conservation areas and national historic sites, as well as the assignment of interpreters and attendants to Visitor Services, and implement as soon as possible the necessary effective measures to comply with the requirements of the *Official Languages Act*,
- b) review the activities and interpretive programs of all of its field units to ensure that they are available in both official languages. Notices of activities and interpretive programs must indicate the language in which they will be held so that services are of equal quality and members of the public can communicate in the official language of their choice.

**RECOMMENDATION 7
(PARTIALLY IMPLEMENTED)**

The Commissioner of Official Languages recommends that Parks Canada ensure that employees who are required to communicate with the public have language skills that reflect the realities and requirements of their positions in terms of the Agency's official languages operational obligations. Moreover, the Agency must conduct an in-depth review of the bilingual skills of all of its employees to verify that there is sufficient capacity to provide services of equal quality in English and French.

RECOMMENDATION 8 (NOT IMPLEMENTED)

The Commissioner of Official Languages recommends that Parks Canada develop a mechanism for regular and formal consultations of national, provincial and regional representatives of official language communities. He also recommends that Parks Canada take the specific needs of these communities into account when developing its activities, programs and services for visitors.

RECOMMENDATION 9 (NOT IMPLEMENTED)

The Commissioner of Official Languages recommends that Parks Canada establish an evaluation framework for the implementation of Part IV of the *Official Languages Act*, implement an appropriate monitoring mechanism and evaluate all of its services related to bilingual service delivery as well as those offered by third parties. The Agency must take necessary measures in the event of non-compliance.