



Office of the
Commissioner of
Official Languages

Commissariat
aux langues
officielles

AUDIT

of the Delivery of Bilingual Services
to Visitors by Parks Canada

FINAL REPORT

September 2012



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HIGHLIGHTS

The Office of the Commissioner of Official Languages conducted an audit of Parks Canada from May to October 2011 to determine how well the Agency is meeting its language obligations to visitors.

Parks Canada is the steward of national parks, national marine conservation areas and national historic sites that offer Canadians a memorable experience of our country's national and historic treasures. Visitors care a lot about the overall quality of the services and information they receive, as well as the accessibility of the services provided to meet their needs. The network of sites under Parks Canada's stewardship is a symbol of Canadian identity that is recognized worldwide.

Our audit had four objectives. First, we examined whether senior management was committed to implementing Part IV of the *Official Languages Act*. Second, we checked whether personnel provided the active offer and services of equal quality in English and French at all sites, and whether planning was effective for the provision of bilingual services. We also verified whether the Agency consulted representatives of official language minority communities in the various regions and took the results of these consultations into consideration when planning for the provision of bilingual services. Finally, we checked whether Parks Canada effectively monitored the quality of its service delivery in both official languages throughout its network.

During our on-site visits, representatives of the Office of the Commissioner of Official Languages received a warm welcome and were always greeted with a “*Hello! Bonjour!*” Employees understand their obligations regarding the active offer of bilingual services. We can confirm that the Agency has made noticeable progress in this area since 2008–2009, when it received a negative evaluation on the report card issued by the Office of the Commissioner of Official Languages. Providing mandatory training and educating staff about this issue have been successful.

It is also important to highlight Parks Canada's tremendous effort to provide visitors with a wide range of high-quality communications materials in English and French, including printed documents (e.g., guides, publications, interpretive signs) and electronic communications (e.g., Web site, Facebook page, Twitter messages, YouTube videos).

Our audit found that senior management showed leadership when they developed and implemented the service standards listed in *Parks Canada Service – Quality Service*

Standards for You, which starts with greeting visitors in English and French. These service standards are based on the establishment of a new structure that focuses on the visitor experience.

The Agency appointed an official languages champion to promote linguistic duality on behalf of the Executive Management Committee to all personnel. It has a structure for managing its official languages program; however, the structure should be evaluated in order to verify whether the program has been effectively implemented throughout the organization. The Agency must establish a formal network of official languages coordinators and define their roles and responsibilities. It also needs to monitor official languages activities more closely in the field units.

Our findings led us to conclude that Parks Canada needs to improve the management of its official languages program by developing an accountability framework, a new official languages action plan (complete with timeframes), performance indicators, an accountability mechanism for the program's implementation, and a performance assessment program for employees who are required to communicate with the public and who negotiate service agreements with third parties. The Agency also needs to revise its official languages policy in order to better reflect its realities, review and revise the language clauses in third-party service agreements, establish a formal consultation mechanism to determine the specific needs of official language minority communities, and develop formal monitoring mechanisms. It also needs to improve its official languages governance, especially because its activities are highly decentralized.

Our audit revealed that the Agency still has some challenges in terms of service delivery, mainly due to the size of the geographical area that it serves and partly due to the fact that employees are located at entrance points far away from each other. Our meetings with employees and our observations at sites targeted by the audit produced varied results. In some national parks, we noted shortcomings in the bilingual delivery of activities and interpretive programs and in the planning for the provision of bilingual services. Some sites could not provide services in the minority language for various programs, and others could provide some programs in English or French only if requested in advance, which is not always possible for visitors to do. The Agency has work to do to improve all of its services and to promote linguistic duality. We also found anomalies in the language requirements of bilingual positions, in the language profiles established for positions that involve

communicating with the public, and in the bilingual capacity needed to provide services of equal quality in English and French to visitors.

Overall, Parks Canada must continue to be a leader in linguistic duality by taking specific and concrete measures. The Agency should be able to raise the bar in order to provide visitors with services of equal quality in English and French and to comply with Part IV of the *Official Languages Act*.

The Commissioner has made nine recommendations to improve the experience of visitors who wish to be served in the official language of their choice.

We are satisfied with the measures and timeframes proposed in the Parks Canada action plan for implementing eight of the nine recommendations. The list of recommendations by objective and the institution's comments and action plan are in Appendix C of this report. We are only partially satisfied with the response to Recommendation 8. We believe that the Agency must implement all of the recommendations to comply with its obligations under the *Official Languages Act* in terms of communications with the public and the delivery of bilingual services.

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INTRODUCTION

Parks Canada Agency, which has reported to Parliament since 1998 through the Minister of Environment, protects and promotes significant representations of Canada's natural and cultural heritage. Responsible for one of the world's largest networks of heritage sites, it fosters public understanding, appreciation and enjoyment of Canada's cultural heritage in ways that ensure the ecological and commemorative integrity of these places for present and future generations. Parks Canada provides meaningful recreational and educational experiences to millions of visitors. The Agency has a duty to ensure that the public can communicate with it in English or French at its headquarters as well as in all national parks, national marine conservation areas and national historic sites in Canada. This requirement is set out in paragraphs 9 (a), (b) and (c) of the *Official Languages (Communications with and Services to the Public) Regulations* under the *Official Languages Act*.

In 2011, Parks Canada celebrated its 100th anniversary. On May 19, 1911, the Government of Canada created the Dominion Parks Branch, which later became Parks Canada. Over the years, the Agency has been a part of Indian Affairs and Northern Affairs Canada and Canadian Heritage. Our audit was timely because there were many festivities planned across Canada to celebrate the Agency's centennial.

Parks Canada, which has some 4,000 employees, manages 43 national parks, 167 national historic sites and 4 national marine conservation areas. In 2009–2010, the Agency welcomed close to 21 million visitors to its sites. It has a highly decentralized organizational structure, including 4 service centres and 33 field units across Canada, where a large number of employees hold seasonal positions, which brings its own challenges.

Our research revealed that the Agency has some difficulty when it comes to providing service to the public. Parks Canada needs to understand the changing recreational patterns of Canadians and visitors from abroad in order to provide meaningful experiences in innovative and interactive ways. It must also maintain or restore the ecological and commemorative integrity of the sites while offering its visitors educational programs and activities that cultivate understanding. Specifically, in 2005, the Minister of the Environment asked Parks Canada to invest in public education and the enhancement of visitor experiences in order to create a broader culture of conservation. Responding to this demand, the Agency underwent a major restructuring and created the External Relations and

Visitor Experience Directorate in 2005. Activities carried out by the new directorate help the Agency to better understand and serve the interests of Canadians, to provide opportunities for relevant and educational experiences, and to coordinate outreach efforts more effectively to foster personal relationships between Canadians and their heritage sites. To meet these objectives, Parks Canada established service standards, detailed in *Parks Canada Service – Quality Service Standards for You*, which were communicated to all personnel. We were told that the restructuring had resulted in extensive work on job classification, including the development of generic work descriptions and a review of language requirements of positions.

The Agency delivers its mandate through a program activity architecture composed of six main activities. The program activity architecture is the structure used by the Agency to present its corporate plan and to report to Parliament and to Canadians. The Agency's core programs work to establish heritage places, conserve heritage resources, promote public appreciation and understanding, and enhance visitor experience. The Agency and its partners provide opportunities for enhanced visitor experiences by setting the stage for visitors to enjoy meaningful, high-quality experiences through the provision of information, infrastructure and facilities, and through programs, services and personnel that respond to visitor needs and expectations.

The Agency indicated that its core programs are linked by many interconnected priorities and expected results. These programs form the platform on which Parks Canada defines its contribution to federal sustainable development goals.

Audit objectives and legislative framework

Although Parks Canada has a number of obligations under the Act, our audit focused mainly on Part IV, communications with and services to the public in both official languages in national parks, national marine conservation areas and national historic sites. The purpose of the Act is to ensure respect for English and French as the official languages of Canada, their equality of status, and equal rights and privileges as to their use in all federal institutions. The Act also guarantees the right of the public to have equal access to services of equal quality in both official languages. This obligation applies to the Agency's headquarters as well as its entire network. Parks Canada is required to meet its obligations under the Act and under paragraphs 9 (a), (b) and (c) of the *Official Languages (Communications with and Services to the Public)*

Regulations, among others. To do this, Parks Canada must implement the policies and practices relevant to its mandate.

Parks Canada is also subject to section 25 of the Act, which concerns services provided by third parties on its behalf. This obligation means that the institution is required to verify that organizations or businesses that provide service to the public or that communicate with members of the public on behalf of Parks Canada do so while fully complying with the requirements of Part IV of the Act. Parks Canada must ensure that third parties, including cooperating associations,¹ concession holders and organizations that manage national historic sites, communicate with the public and provide their services in both official languages as if they were the institution itself.

Methodology

Our 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 are specific to this audit and do not preclude the possibility that other problems could exist within the institution.

Our audit involved an analysis of all the activities related to bilingual service delivery in order to verify the Agency's compliance with Part IV of the Act. The objectives of the audit were to examine whether Parks Canada senior management was committed to implementing Part IV of the Act in order to provide visitors with services of equal quality in English and French; whether front-line personnel at all sites provided the active offer and services of equal quality in both official languages to the public in person, by telephone, in writing, via electronic systems (including the Internet and social media) and through videos; whether the Agency consulted representatives of official language minority communities in the various regions when developing its programs and activities and took the specific needs of these communities into account when planning for the provision of bilingual services; and whether the Agency effectively monitored the quality of its service delivery in both official languages in all national parks, national marine conservation areas and national historic sites.

We began the audit at Parks Canada headquarters and then conducted on-site visits and made observations of service provided by telephone from June to October 2011. During our audit, we made scheduled visits to 13 national parks, 2 national marine conservation areas and 18 national historic sites in 10 provinces. We also visited seven sites that were not part of the scheduled visits. We made observations of service provided by telephone among the 40 sites visited. These sites are listed in Appendix B. It is our opinion that this audit allowed us to present an overall picture of bilingual service delivery for Parks Canada visitors.

Over the course of the audit, we conducted 120 interviews with Parks Canada staff, including the Official Languages Champion, the researcher and program analyst at the National Resourcing Programs Unit who is responsible for coordinating activities related to the Agency's official languages program, senior executives, managers, team leaders, Visitor Services interpreters and attendants, and lock keepers who work in the national parks, national marine conservation areas and national historic sites. We also interviewed Parks Canada's official languages specialist at the Western and Northern Service Centre, as well as representatives of official language minority communities in the provinces.

We then examined documents obtained from the National Resourcing Programs Unit—which is responsible for coordinating, monitoring and supporting programs related to the Act—including a business plan, a draft official languages action plan, policies, guidelines, service standards and the *Hello! Bonjour!* tool kit. We also examined documents collected during on-site visits, including numerous publications, organizational charts, memoranda of understanding, generic work descriptions, interpretive programs, official languages work tools, follow-up reports on the Visitor Information Program survey, visitor experience training material, annual official languages reviews submitted to the Treasury Board of Canada Secretariat, correspondence and performance agreements. We examined Parks Canada's intranet, Web site, Facebook page, Twitter messages and YouTube videos.

¹ Cooperating associations raise funds to promote a national park or national historic site.

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.

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

Parks Canada has a structure for implementing its official languages program. In fact, the National Resourcing Programs Unit is responsible for coordination, monitoring and support to programs related to the *Official Languages Act*. This unit reports to the Chief Human Resources Officer, who is responsible for implementing the Act. There is also a mechanism for managing complaints regarding official languages. However, many managers we met with said that they do not remember any complaints being filed about their field unit. All the managers who were asked whether they knew who the Official Languages Champion was responded that they did not know that such a person existed. The champion, who is the Vice-President of Heritage Conservation and Commemoration, told us that he plays a leadership role: he is the spokesperson on the Executive Board and must set an example. He also works in cooperation with the Human Resources Directorate and ensures that employees know their language rights.

Parks Canada does not have an accountability framework, a tool required to establish the guiding principles for the effective management of official languages files and to establish and define the roles and responsibilities of the Official Languages Champion, senior executives, managers, team leaders and all employees who are required to communicate with the public. However, according to its draft 2011–2014 official languages action plan, the Agency plans to develop an accountability framework.

Finally, to verify senior management's commitment to official languages, we examined the Parks Canada Agency Corporate Plan 2010–2011 / 2014–2015. Included in the plan is the Parks Canada Charter, which contains the following commitment: "To serve Canadians, working together to achieve excellence guided by values of competence, respect and fairness." It should be noted that neither the Charter nor the plan mentions linguistic duality.

Network of official languages coordinators

Our interviews revealed that there is no formal network of official languages coordinators at Parks Canada. However, some employees are interested in official languages issues and contribute in their own way, in the absence of any specific official languages guidelines, strategies or objectives. Official languages activities are not included in their work descriptions or performance objectives.

That being said, Parks Canada has appointed an official languages specialist, who works at the Western and Northern Service Centre. This specialist established a group that was designated as a "network of coordinators." The specialist shares official languages information with the network by e-mail and teleconference, promotes official languages, helps the official languages unit at headquarters by providing advice on bilingualism policies and practices, provides training to improve the visitor experience and conducts regular observations when visiting sites within her sector. The specialist is a member of the Manitoba Interdepartmental Network of Official Languages Coordinators. We were told that the specialist's duties do not extend to providing human resources advice related to the language profiles of bilingual positions.

It is important to note that the statement of roles and responsibilities of the official languages specialist specifies that the incumbent must liaise with official language minority communities, share information regarding these communities and be the contact person for section 41, which focuses on enhancing the vitality and development of official language minority communities in Canada and on promoting the use of English and French in Canadian society. However, this position does not require the incumbent to conduct or participate in formal consultations with the communities. These functions are primarily the responsibility of the managers, the External Relations and Visitor Experience Directorate, and the researcher and program analyst and the human resources advisor from the National Resourcing Programs Unit. We were told that there was no official languages specialist at any of the service centres in Eastern Canada.

The documentation that we received regarding the network of coordinators' teleconferences showed that discussions focused on tools, videos, presentations, training opportunities and activities for maintaining second-language skills. This documentation was sparse, however. Indeed, we were only given a few agendas for meetings since 2008, and we were told that there were no minutes for these meetings. From the many interviews that we conducted, we learned that the information coming from these meetings was not always communicated to front-line employees.

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.

Visitor experience

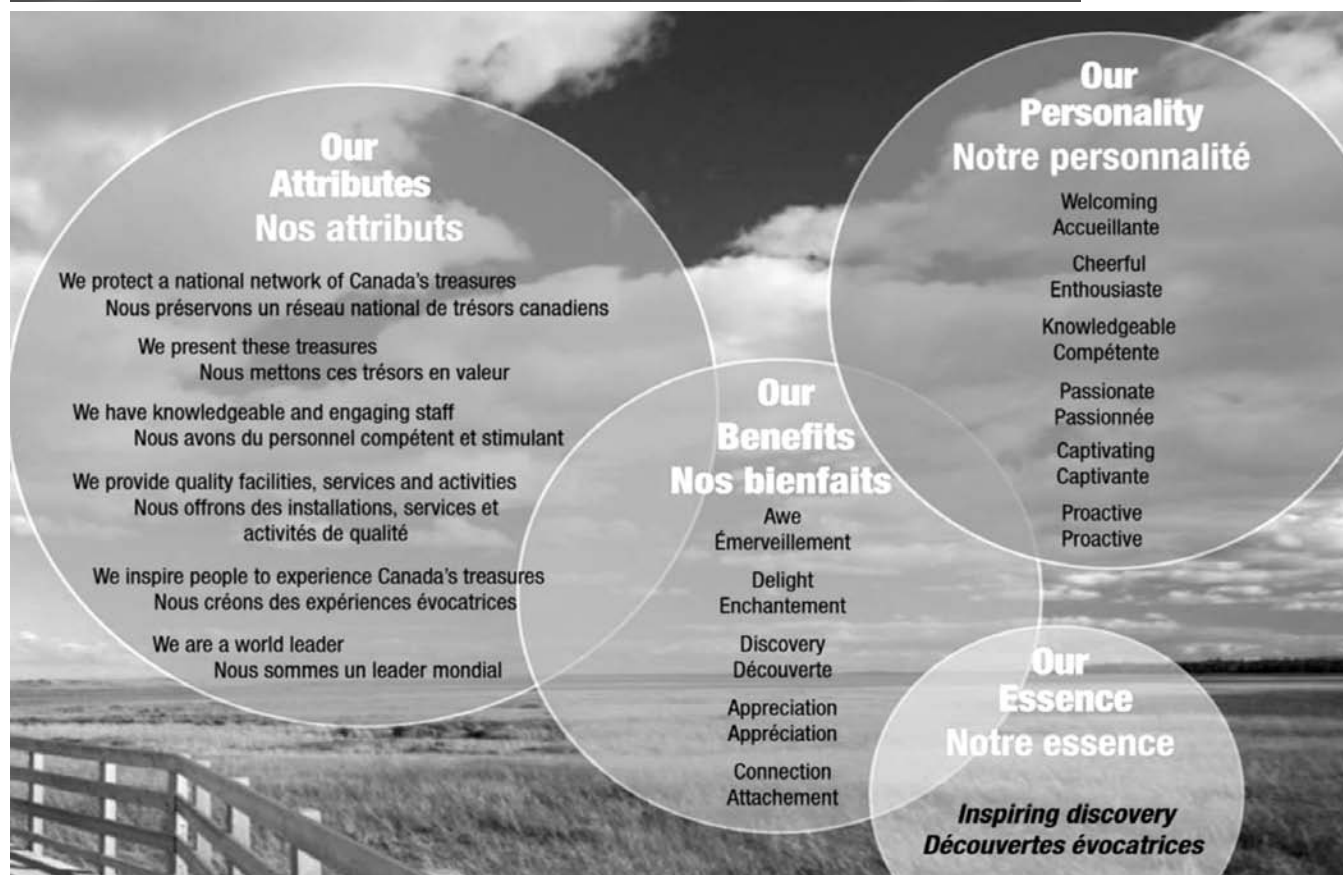
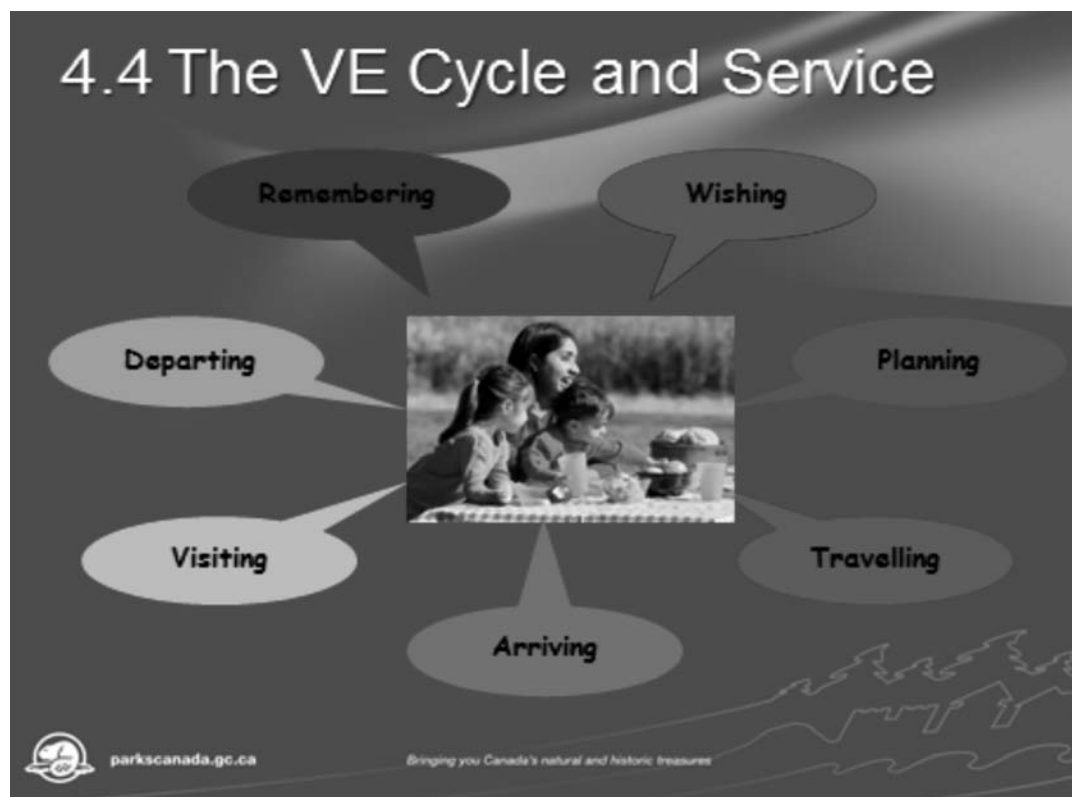
During the Agency's 2005 reorganization, the External Relations and Visitor Experience Directorate was created to provide national leadership in order to support and achieve the Agency's mandate and in order to guide the work of the following five branches:

- Social Science Branch
- Public Information and Education Branch
- Visitor Experience Branch
- Stakeholder and Partner Relations Branch
- Corporate Communications Branch

Our audit focused on the activities of the Visitor Experience Branch, which is responsible for developing policies, guidelines, frameworks and strategies, and for designing tools and training related to national and local visitor experience objectives. The Visitor Experience Branch also provides national functional leadership to the field units in the areas of planning, interpretive product development, recreational activities, service delivery, promotion, advertising and external communication. It implements national pilot projects and programs, and promotes best practices that help the field units in their operations related to visitor experience. It also manages the day-to-day operations of the Parks Canada campground reservation service as well as the information transaction centre. All of the Visitor Experience Branch's activities are very visible and have a major impact on the general public.

The visitor experience concerns some 21 million Canadians who visit the national parks, national marine conservation areas and national historic sites each year. Parks Canada defines it as the sum total of a visitor's interaction with the protected natural or cultural heritage site that helps him or her create meaning and establish a connection with the place. The visitor experience begins with awareness of the site, followed by planning the visit, travelling to the site, and the welcome and orientation upon arrival. Once on site, the visitor may participate in recreational and interpretive activities and make use of various accommodations, trails, facilities, services and supporting infrastructure, including those pertaining to prevention and enforcement of the Act as it relates to visitor experience. The Agency ensures visitor satisfaction by providing its staff with mandatory Quality Visitor Services training. It monitors the implementation of its quality service standards to ensure consistency and continued service improvement. These activities lead to a sense of personal connection for Canadians. We applaud Parks Canada's commitment in this regard. We do believe, however, that a positive visitor experience must also include the delivery of services of equal quality in English and French, and that the training provided to staff should take this into consideration.

The following diagrams* illustrate the Visitor Experience Cycle.



* Diagrams provided by Parks Canada

Service standards

The Agency has established clear and specific service standards that it can be proud of. Detailed in *Quality Service Standards for You*, they were developed by front-line staff. According to this document, “you will experience Parks Canada service when we:

- Greet you in both official languages
- Welcome you in a cheerful, courteous and sincere way
- Anticipate, recognize and work to fulfill your needs and expectations
- Effectively communicate accurate and up-to-date information
- Offer personalized service that encourages unique, engaging experiences
- Share our passion through captivating stories
- Proactively seek, appreciate and respond to your feedback”

We congratulate Parks Canada for developing and implementing these service standards. They seem to work well, and most of the employees we interviewed were familiar with them and followed them. We met with interpreters and reception staff who are very passionate about their work and willing to serve visitors. We would like to make an observation about the first service standard, however. We believe that Parks Canada staff need to go beyond a simple greeting and automatically offer visitors services in both official languages. The service standard could thus be worded as follows: “Greet you **and provide you with services** in the official language of your choice.”

b) Verify that Parks Canada’s official languages action plan allows for the effective implementation of Part IV of the *Official Languages Act* with respect to services provided to visitors at national parks, national marine conservation areas and national historic sites, in person, by telephone, in writing, via electronic systems (including the Internet and social media) and through videos.

Parks Canada has developed a draft 2011–2014 official languages action plan. This plan will be approved by the Management Executive Committee on the recommendation of the Chief Human Resources Officer. The latter is also responsible for coordinating and monitoring the achievement of the plan by the units responsible for its implementation.

The draft action plan aims to achieve compliance with all components of Part IV of the Act. It also refers to language of work (Part V) and equitable participation (Part VI). Our analysis of the plan proved rather negative. The plan’s proposed objectives are somewhat vague and lack specific measures to ensure effective and full implementation of Part IV of the Act within the various program areas, such as the national parks, the national marine conservation areas and the national historic sites, which have different realities. The following are excerpts from the plan: “all services are offered in both official languages and are of equal quality,” “all oral and written communications are in the official language chosen by the public,” and “various approaches have been used with official language minority communities to enable exchanges of information within the Agency.”

The plan does not say who is to be responsible for carrying out the activities, nor does it specify timeframes. The responsibility falls to the field units, which is not acceptable. Except for those working in official languages, the employees we met with, including senior executives and managers, were not aware of an official languages action plan. None of the field units in the various regions throughout Canada have an official languages action plan or an operational activity plan based on the national action plan. We believe that plans like these would enable field units across Canada to take their specific situation into account in order to achieve concrete results in terms of bilingual service delivery. We were told that the field unit corporate plans developed over the past two years did not include a review of employees’ language requirements, an examination of language profiles for existing bilingual positions or an evaluation of field units’ bilingual capacity.

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.

c) Verify that Parks 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 the *Official Languages (Communications with and Services to the Public) Regulations*.

Parks Canada does not have a specific official languages policy; rather, it uses the Treasury Board of Canada Secretariat's *Official Languages Policy Framework* (2004) and the related *Policy on the Use of Official Languages for Communications with and Services to the Public* (1999).

These policies are dated and do not accurately reflect the Agency's realities. Many managers and front-line employees we met with said that they were not familiar with the official languages policy, but that the Agency's policies were available on the intranet. The vast majority of staff confused the official languages policy with the *Official Languages Act*.

In light of the above, and to help Parks Canada remedy this situation, the Commissioner has issued the following recommendation.

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.

d) Verify that Parks Canada is effective in informing all employees assigned to provide services at various sites, either in person or by telephone, about the requirements regarding service delivery in both official languages.

During the audit, the Official Languages Champion sent two e-mails to all personnel: the first was a reminder of Parks Canada's 100th anniversary and the importance of promoting official languages, and the second was about Linguistic Duality Day. Other communications regarding official languages included the following. In 2010, the Chief Human Resources Officer sent one e-mail to mark Linguistic Duality Day and another to present the Translation Bureau's new Language Portal of Canada. In 2008, an e-mail was sent to employees who work in the National Capital Region to inform them about the *Rendez-vous de la Francophonie*. The Official Languages Specialist at the Western and Northern Service Centre sends information to a specific network of employees who are interested in official languages. For example, an e-mail was sent to remind staff about their obligation to make the active offer of bilingual services (*Hello! Bonjour!*) during the Vancouver 2010 Winter Olympic and Paralympic Games. Other e-mails included an attachment that contained the Office of the Commissioner of Official Languages' e-newsletter, *Beyond Words*. Most people we met with said that they had not received information about official languages or about Parks Canada's requirements, except during training on the active offer of bilingual services. We also noted that official languages were not included among the topics presented during the orientation session for new employees held in June 2011.

It is important to mention that many front-line employees do not have access to computers or the intranet, nor do they have a work e-mail address. Because of this, a note appears at the bottom of the e-mails to remind managers that they need to make sure that all employees receive the information, including attachments, either by posting it, by distributing it or by any other appropriate means. Our interviews revealed that, despite the note at the bottom of the e-mails, employees do not always receive information sent by e-mail.

Our audit showed that employees are not always effectively informed of official languages issues and related activities. We also noted that the National Office unit responsible for coordinating and monitoring the official languages program is not very visible, nor is it well known to the field units. Given this situation, we encourage the Agency to

publicize the unit's roles and responsibilities as well as its requirements related to all aspects of equal quality service delivery in English and French, whether it be through information bulletins, through a formal network of official languages coordinators representing field units across Canada, within the framework of its training modules, or by any other appropriate means.

e) Verify that the training modules for Parks Canada employees include the Agency's obligations and employees' responsibilities pertaining to official languages.

As mentioned at the beginning of this report, Parks Canada is targeting its strategies and activities more towards the visitor experience. This initiative includes training in the active offer of bilingual services, which is provided to all front-line employees and all staff, including managers, who are required to interact with visitors. This mandatory training is given each year at the start of the summer season to ensure that all relevant personnel understand the active offer, one of the components of Part IV of the Act. A kit including a standard presentation was developed for the trainers. Employees told us that they had not received any other official languages training.

In terms of second-language training, our interviews revealed that it is offered mainly to senior executives and managers. Other employees are encouraged to take courses outside of work hours and during the winter, when tourist sites are closed. Employees can also use their learning plan to indicate their interest in taking second-language training. The *Official Languages Training Guide* is available on the intranet to provide employees with information on second-language learning.

"We need to look at a strategy to encourage opportunities for language development such as exchanges, learning opportunities to improve second language competency. That does not exist." – Manager

"I took French training on my own." – Lock operator

It is our opinion that Parks Canada could use the training sessions given at the start of the summer season to educate its staff about all of the components of Part IV of the Act, especially the bilingual service delivery that must follow the active offer. We also believe that the Agency should determine methods to provide its entire staff with language and retention training.

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

The performance evaluations of senior executives and managers who have bilingual service delivery responsibilities, including employees who negotiate service agreements with third parties, do not contain objectives related to official languages. Moreover, the performance of employees who are required to communicate with visitors in English and French is not evaluated in terms of services provided in both official languages, except in the cases of Visitor Services attendants in the Banff field unit and staff who perform duties specifically related to the official languages program. The criterion included in the Banff evaluation report focuses solely on the active offer of bilingual services as a performance factor in the employee's ability to communicate. Senior executives and managers told us that performance objectives were included in their performance agreements only if problematic situations occurred in their field units. It is our opinion that Parks Canada should encourage a proactive approach rather than reacting to problems.

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.

g) Verify that partnership agreements with various governments and contracts negotiated with third parties take Parks Canada's language obligations into account.

We sought to determine whether the service agreements with third parties (i.e., businesses that act on behalf of Parks Canada) contained a clause describing the Agency's official languages obligations. We obtained copies of the contracts of associations acting as partners or stakeholders that manage the shops located in the welcome centres (selling books and souvenirs), concession holders who manage the snack bars, and camp grounds and security companies (commissionaires).

We learned that some national historic sites are managed by different organizations that work together with Parks Canada. This is the case for the Gulf of Georgia Cannery National Historic Site. We examined the service agreement between Parks Canada and the company that manages the site. The agreement, which was in effect from April 1, 2007, to March 31, 2010, and extended until 2011, clearly stipulates the company's obligation to provide services in both official languages in person, by telephone and in writing. The following is an excerpt:

5b) The Contractor shall have at least one trained bilingual (English/French) employee available at all times during the hours of operation to serve the public in-person or by telephone . . . ; 5c) Provide non-personal services to the public in both Official Languages of Canada. All services including electronic/internet, signs, notices and printed material used for the public are to be written in both official languages.

The agreement also states that Parks Canada will provide translation help to the company. Parks Canada's requirements regarding the delivery of services of equal quality in English and French are clear and specific in this agreement, and we are satisfied.

We cannot say the same for the other partnership agreements we examined, however. We noticed that the language clauses are not the same in all contracts. More specifically, the agreements with cooperating associations state that the associations must "make every effort to provide services in both official languages." Parks Canada needs to insist that the partners with whom it has agreements do more than "make every effort" to provide services: they should provide services in English and French at all times to meet the Agency's obligations under Part IV of the Act. We believe it is important to remind all partners

that they are required to provide services of equal quality in English and French throughout Canada. The Agency should identify corrective measures to implement in the event of non-compliance. In a national park, we observed that a partner company supplied Parks Canada with only one bilingual officer out of six even though the *Call-up Against a Standing Offer for Commissionaires* specified the need to recruit bilingual security officers. We also noted, in another service request, that Parks Canada had not specified its official languages obligations, nor had it included an official languages clause; however, the Agency had budgeted funds for a bilingualism bonus. The Agency needs to regularly verify whether third parties are providing services in both official languages to ensure that its obligations under section 25 of the Act are being met. This subject is also discussed later in this report under Objective 4 on monitoring mechanisms.

"There are problems in the shops and restaurants because the employees are unilingual." [translation] – Interpreter

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*.

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.

a) Verify that Parks Canada actively offers and provides services in both official languages at national parks, national marine conservation areas and national historic sites. Verify that the services provided in person, by telephone, in writing, via electronic systems (including the Internet and social media) and through videos are of equal quality in English and French.

First, we should mention that Parks Canada has been the subject of a number of complaints regarding a lack of French outside Quebec. In the past three years (2007–2008 to 2010–2011), the Office of the Commissioner of Official Languages has received 32 complaints, primarily regarding a failure to provide the active offer and bilingual service. Most of the complaints involved national parks. To address the problems related to the active offer of bilingual services, Parks Canada created the *Hello! Bonjour!* tool kit, which includes a video and various tools for employees. We congratulate the Agency on its efforts—the video has served as a model for other institutions in similar situations.

When Parks Canada was evaluated for the Office of the Commissioner of Official Languages' 2008–2009 report cards, it received a C (Fair) rating. The active offer in person was made in only 39% of cases. Visual active offer was made in 92.9% of cases and in-person services were provided in the language of the client's choice in 88.9% of cases. For services provided by telephone, active offer was made in 81.8% of cases, and service was provided in the minority language in 80.3% of cases.

"Sometimes the visitor will tell us if they are not happy, such as wanting a Francophone guide." – Interpreter

Visual active offer, displays, signage and publications

Visual active offer means signage and displays, including safety notices, publications, videos and photographs. Parks Canada is fulfilling its visual active offer obligations very well. The *English/Français* pictograms were very visible and displayed uniformly at all service points, even on outdoor exhibition carts. Employees who interact with visitors were proudly wearing their *English/Français* pin. Signs on roads,

toll gates, campground entrances, counters and reception areas were in both English and French, as were notices and numerous displays and interpretive signs both indoors and outdoors.

We examined a large number of publications, including brochures, guides, activity programs and maps—all were bilingual. Some documents were printed with one language on each side, while others were available in two separate versions, one in English and one in French, each indicating that the publication was also available in the other official language. The quality of the English and French on the signage and publications was excellent. Considering the wide variety of documents available at its many sites the Agency has clearly gone to great efforts, and these efforts deserve special mention.

Videos, electronic displays and slideshows with recorded commentary are frequently used to provide information to visitors at various Parks Canada sites. During our on-site visits, most of these interpretive tools were available in both official languages; however, some did not work when the *Français* button was pressed. We also observed that the films, shown mainly in the visitor centres, are not systematically presented in both English and French. Visitors must ask a Visitor Services attendant to see a film in French. One visitor centre had a sign on the door of the room where the films are shown, indicating that visitors wishing to see the French version should ask an attendant. We encourage the Agency to make this standard practice at locations where the two versions of the films are not shown in regular rotation. Otherwise, visitors may not know that the films exist in the minority language.

Active offer in person or by telephone

We are convinced that the situation has greatly improved regarding the active offer of bilingual services in person since the most recent report card from the Office of the Commissioner of Official Languages. Parks Canada has demonstrated leadership by developing and distributing the *Hello! Bonjour!* tool kit, and providing annual or biennial mandatory training to all personnel who are required to communicate with visitors. During our visits across Canada, we noticed that the active offer was made systematically in visitor centres, discovery centres, and nature centres, as well as everywhere else in national parks, national marine conservation areas and national historic sites. The reflex is definitely there. In our observations of services provided by telephone at the 40 sites included in this audit, the active offer was made in 87% of cases.

“We have specific guidelines to greet and serve the visitors that are all standardized and part of the QVE [Quality Visitor Experience].” – Interpreter coordinator

***Bilingual services
(in person, by telephone, in writing and through video)***

Most national parks and national historic sites that we visited offer visitor services only during the summer season, from mid-May to mid-October. Each field unit has permanent full-time and seasonal employees as well as temporary employees, who are mostly students. The full-time permanent employees ensure continuity of services for the rest of the year. It is therefore essential for Parks Canada to ensure that a sufficient number of these employees are bilingual. Our audit revealed that the Agency still has some challenges in terms of service delivery, mainly due to the size of the geographical area that it serves and partly due to the fact that employees are located at entrance points far away from each other.

Our audit found weaknesses in terms of bilingual services to visitors. Our interviews with managers and team leaders revealed that they are not sufficiently knowledgeable about their roles and responsibilities in terms of planning for the provision of bilingual services in order to comply with Parks Canada’s language requirements. Planning for the provision of bilingual services presents problems in certain field units throughout Canada. By “planning for the provision of bilingual services,” we mean how Parks Canada organizes its service delivery: for example, when assigning bilingual personnel and allocating them to key locations and when establishing work schedules to ensure that there are enough bilingual employees on site.

“Other stations have bilingual employees and we would use the phone.” – Lock operator

“Scheduling can be a challenge to ensure offer every day for guided tours and staff exhibits.” – Team leader

During our visits, we noticed a lack of bilingual interpreters and attendants at the entrances to some national parks and campgrounds, and in one nature centre. The employees on site were not able to respond to our requests in French and, in most cases, the remoteness of their location prevented them from being able to offer administrative measures in order to serve us in the official language of our choice. To resolve the situation, these employees gave us French guidebooks and maps. In another case, unilingual interpreters who greeted visitors and were not able to serve them in French had visitors talk to a bilingual colleague over

the telephone. At a national historic site, a group of French-speaking visitors who were part of an organized tour were watching a film in English, because there was no indication that a French version existed. In addition, the counter staff at this site were not able to communicate with us in French. In one national marine conservation area, only the greeting was bilingual. Instructions and notices were in English only. At the end of the presentation, visitors were informed that they could ask questions in the official language of their choice. This way of doing things is not acceptable, because the quality of the service was not equal for the French-speaking visitors. Although the Agency has taken some administrative measures to provide services in the minority language, it needs to focus on providing services of equal quality in English and French.

“In person, the quality of services is barely good. There are not enough bilingual employees. The required level should be C. For the rest (print and electronic materials), very good.” – Senior executive

Our observations and interviews revealed that a number of scheduled interpretive activities were not offered in both English and French. Some national parks’ schedules had no interpretive activities at all in the minority language. We also noted that presentations were delivered much less frequently in the minority language. The reasons we were given were lower demand in the minority language and not enough bilingual interpreters. The fact remains, however, that visitors who speak the minority official language are not receiving the services to which they are entitled. Several people we met with told us that the number of French-speaking visitors from across Canada and from Europe was higher than management believed. It is our opinion that a minimum number of activities must be offered daily in the minority official language, and that others can be provided on request.

“There is an increase of visitors from Quebec; today I greeted five couples who were Francophone.” – Visitor Services attendant (Western field unit)

Because activity guides for visitors have been completely translated, it looks as though all of the activities described in the guides are available in English and French. We noted that some parks and historic sites clearly indicated the date, time and language of the activities in both the English and French versions, which is the correct approach. Scheduled guided tours for groups can be conducted in the minority language if the Agency is advised well enough in advance to ensure that a bilingual interpreter is available. These groups consist mainly of students, seniors and organized tour

groups. During our interviews, we learned that in the winter there are fewer bilingual employees to serve members of the public and respond to their requests for information.

Some of the documentation obtained during our interviews revealed certain details that the Agency has to take into account when hiring staff in various regions. For example, one of the conditions in the agreement for creating a national marine conservation area in St. Edmunds, Ontario, was that residents of this region had to make up 75% of the workforce. The Agency explained that it was difficult to recruit bilingual personnel in this region. While we acknowledge this condition, the agreement does not exempt Parks Canada from its obligations under the *Official Languages Act*. These obligations also apply to agreements signed with Aboriginal peoples.

Our final observations focused on bilingual service provided by telephone. To do this, we used the telephone numbers listed in the Burolis database and in the visitor guides produced by Parks Canada. All of the Agency's sites are bilingual and their telephone numbers are listed on the Burolis Web site,² an electronic directory under the responsibility of the Treasury Board of Canada Secretariat. We found that some of the telephone numbers listed in Burolis were no longer in service; the Agency needs to update its information in this directory. Observations of sites targeted by the audit revealed that service was available in the minority language in 85% of cases.

Electronic communications (Internet and social media)

A review of the Parks Canada Web site confirmed that Internet users have access to content of equal quality in English and French for almost all of the information posted, including online services such as purchasing national passes and reserving campsites.

Parks Canada uses new platforms to disseminate information quickly and communicate with the public. We examined the Facebook and Twitter pages the Agency uses to provide information on its activities and programs. The information was presented on separate English and French pages.

We also examined Parks Canada's YouTube videos and found that many were available in English and French. Some videos that had been made in English had French subtitles.

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.

b) Verify that the bilingual skills of employees at all Parks Canada sites are sufficient to ensure the provision of services of equal quality in English and French.

Our audit found that Parks Canada is finding it difficult to hire personnel, even unilingual personnel, because of the remoteness of its sites and the lack of job security. As mentioned above, many positions are seasonal and often go to students recruited through the Federal Student Work Experience Program. During our interviews, managers stated that this method of recruiting has two drawbacks: first, students do not provide an accurate language profile and, second, they are not always willing to work in remote areas. This program recruits high school, college, technical and university students and electronically matches them with available jobs using skill codes provided by Parks Canada and information from the students' resumés. Students' language skills are also a problem, because their

² www.tbs-sct.gc.ca/ollo/appollo/burolis/search-recherche/search-recherche-eng.aspx

second-language skills are not evaluated. To remedy this situation, we encourage the Human Resources Branch to carefully review this practice in order to help managers. We also encourage managers to consult with human resources advisors, who may be able to suggest other recruitment methods.

During our audit, we sought to determine the bilingual skills of the employees in various field units. To do this, we reviewed the language requirements of positions and the language profiles of employees who are required to communicate with the public in both official languages. We also examined the organizational charts of the field units we visited as well as the generic work descriptions of managers (Visitor Experience), team leaders (of interpreters and attendants), interpreters, Visitor Services attendants, lock operators, and enforcement officers.

Our analysis revealed anomalies in the language requirements and profiles for positions. Although generic work descriptions exist for each group of employees we examined, the language requirements vary for identical positions within a single team or field unit. For example, the language profile of an interpreter position sometimes requires Level B and sometimes Level C. Some interpreter positions require second-language skills only for oral interaction, while others require all three skills: reading comprehension, written expression and oral interaction. Our analysis showed similar results for interpreter coordinators, team leaders and Visitor Services attendants. This system leads to confusion and complicates the management of the language skills required for the Agency's positions. It is important to remember that language requirements are established based on the complexity of subjects handled by the incumbents. In our opinion, the positions of interpreter coordinator, interpreter and team leader should require Level C because the incumbents need to be able to provide explanations that may lead to discussions and exchanges of complicated ideas. Many of the interpreters we met with told us that they had to write and translate their own interpretive programs. As for the other positions, the institution needs to define language profiles after conducting an objective analysis of the incumbents' duties and responsibilities. A good number of managers and team leaders we spoke with were somewhat familiar with the language profiles of different positions and the methods used to determine the

language skills required. All of the above-mentioned issues are something to be concerned about, and the Agency needs to take a closer look at the situation.

"We try to change the linguistic profile of the positions as people leave or take retirement." – Senior Executive

In our opinion, Parks Canada needs to use its human resources management system and consult with its field unit managers to carefully evaluate its bilingual capacity so that it can accurately identify any shortcomings and take necessary action. This evaluation will help it standardize the language requirements for similar positions in all field units in order to provide services of consistent quality in English and French. Parks Canada also needs to improve its official languages governance in order to establish the language profiles of bilingual positions and determine the bilingual skills required for front-line services.

In our interviews, we discovered that there are unilingual employees in bilingual positions, which is not acceptable. The institution needs to examine these positions and determine which employees do not meet the language requirements of their positions. Since, at Parks Canada, the managers determine the language profiles and requirements for positions and have the necessary staffing authority, we encourage the institution to implement a mechanism for consulting managers, along with mandatory training, so that language requirements and profiles are appropriate and consistent throughout the organization and reflect the realities and duties of the positions. This needs to be done in the near future, and the necessary measures need to be taken quickly.

"The language requirement of my position is BBC, and my profile is BBB. I was grandfathered in." [translation] – Interpreter

"My job is bilingual imperative at level BBB. I have BBA." – Team leader

Our review of the work descriptions found that the managers' work description includes the requirement to "create and maintain networks with partners and interested parties." We believe that this statement also applies to official language minority community organizations. The work descriptions of the other positions also include a statement indicating that the incumbents must communicate with visitors or interested parties to provide interpretive programs and activities, to respond to requests for information and to provide information in person, by telephone and electronically on activities, services, facilities,

regulations and various notices. Parks Canada must therefore establish consistent language profiles for all the positions listed above and consider the fact that the language profiles of some of these positions need to be raised.

Our audit included a review of the number of bilingual employees who are required to communicate with visitors. We found there to be a significant lack of bilingual employees in certain groups and a lower percentage of them in field units located in Western and Northern Canada. The Quebec field unit had a low percentage of bilingual Visitor Services attendants, while Newfoundland and Labrador had a low number of bilingual interpreters and Visitor Services attendants. Please note that this data is approximate.

We examined the bilingual skills of the enforcement officers separately because they fall under headquarters' responsibility. Our analysis of the organizational charts for this employee group revealed that a very low percentage of enforcement officers are bilingual. The language profile of enforcement officers with supervisory responsibilities requires only a Level B for oral interaction skills, whereas the language requirement for enforcement officers is BBB.

"Law enforcement staff at this unit is not bilingual." – Senior executive

The above information shows that the bilingual capacity and language profiles established for certain groups of employees at many sites are not sufficient to provide service of equal quality in English and French. This can have a negative impact on work organization and the planning for the provision of bilingual services. The following statements support the results of our analysis.

"The bilingual capacity is not sufficient; we can move staff from the visitor centre, but it's difficult." – Team leader

"There are gaps; there are not always bilingual employees available to cover leaves." [translation] – Manager

"I work five days a week. When I am off, I am not replaced by a bilingual attendant." – Visitor Services attendant

"Bilingual capacity-analysis is not done in a structured manner, although we identify the gaps." – Manager

"It can happen that a unilingual leader is alone on site." – Manager

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.

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.

a) Verify that Parks Canada has initiated an internal reflection process in order to consider the impact of the *DesRochers* decision on its programs and on how it plans for the provision of bilingual services, and identify how it consults with representatives of official language minority communities in all provinces to determine their service needs and how these communities are informed of the Agency's decisions.

We sought to learn how official language minority communities were consulted—and who conducted the consultations—when developing the Agency's programs and activities. Our interviews revealed that two people in the National Resourcing Programs Unit are responsible for liaising with Canadian Heritage and report, on behalf of the Agency, on the implementation of Part VII of the Act. Field units are responsible for implementing local positive measures to ensure the vitality of official language minority communities across the country and to promote linguistic duality.

In our interviews with representatives of official language minority communities in several provinces, we learned that Parks Canada had not consulted them to determine their needs regarding Parks Canada activities and programs and the planning for the provision of bilingual services. We were not able to obtain the terms of reference, agenda, minutes or any other official document that contained specific information about these meetings. We learned that, although the field units' external relations managers would communicate with members of these communities working

in such sectors as education, these discussions were not held with the specific objectives of a formal consultation. For example, we learned that the Jasper field unit shares its premises with the Association canadienne-française de l'Alberta so that the Association's members can offer French classes to the community, which are then also available to Parks Canada employees. In our interviews, we also learned that some of the Agency's employees occasionally attended events organized by official language minority community associations, or events or meetings in which interested parties were invited to participate, including Parks Canada public consultations. The objective of these meetings, however, was not to consult representatives of official language minority communities and discuss their specific needs in terms of Parks Canada programs and activities. The representatives we interviewed said that discussions with field units tended to be between people who know each other. These practices are not synonymous with formal consultation.

The Agency told us that it holds public consultations every five years when developing its management plans. These consultations, which involve community partners, do not seek specifically to learn the particular needs of official language minority communities. It is our opinion that the Agency could benefit from formal consultations with these communities and could include them in its management plans. However, consultations with official language minority communities need to be more frequent than the public consultations, which are held every five years. They should be held as soon as Parks Canada initiates its programs and services review.

In our opinion, Parks Canada needs to establish a dialogue with official language minority communities and majority organizations across Canada (such as Canadian Parents for French), which could help them in their efforts to recruit permanent staff, seasonal workers and students from these communities.

"We do not promote our positions well because we do not have contact with official language minority communities."
[translation] – Manager

During our audit, we sought to determine how Parks Canada is taking the *DesRochers* ruling into account when developing and implementing its programs. The information we obtained showed that the work had yet to be completed, because Parks Canada had not begun its review of existing and upcoming programs and services since formal consultations had not taken place and the needs of the

pertinent official language minority communities were not known. However, the Agency has told us that it has included this provision in the draft version of its official languages plan, it has consulted its legal services branch to better understand the impact of the ruling on its activities, and it has examined the analytical grid provided by the Treasury Board of Canada Secretariat's Office of the Chief Human Resources Officer.

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.

OBJECTIVE 4

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

a) Verify that Parks Canada has effective monitoring mechanisms (including internal auditing) to ensure that all of its services are of equal quality in both official languages.

Parks Canada conducts surveys every five years in all its national parks, national marine conservation areas and national historic sites in order to evaluate its service delivery. The results are taken into account in activity planning and management. The survey questionnaire is in English and French and includes a specific question on whether visitors were served in the official language of their choice. To analyze bilingual service delivery, we looked at the results of three surveys on the Visitor Information Program: one conducted in 2006 at Fundy National Park, a second in 2007 at St. Lawrence Islands National Park, and a third in 2010 at Banff National Park. The results for Fundy and Banff were "very satisfactory," with service received in the minority language in 89% and 82% of cases, respectively. The results were much less satisfactory for St. Lawrence Islands, which scored only 59%. For this survey, 7% of respondents indicated that they were "not at all satisfied" with the service provided in the minority official language.

In our on-site visits, we examined the cards various field units use to measure client satisfaction. The formats varied from site to site. Some cards, which said “Your comments are useful in our efforts to improve the quality of your visit,” had a blank space for visitors to write their comments. Others asked specific questions and had a space for comments. None of the cards had questions about the availability or the quality of services offered in the official language of the visitor’s choice. We encourage Parks Canada to develop uniform tools to measure visitor satisfaction regarding official languages and to include a question about services provided in English and French.

“I don’t know of any control mechanisms.” – Manager

Some managers told us that they thought they had had visits from Parks Canada mystery shoppers; however, they had not received any results regarding these supposed visits.

Apart from the foregoing, Parks Canada does not have official monitoring mechanisms to evaluate the results of its activities and programs in terms of Part IV of the *Official Languages Act*. Our audit also found that the Agency had not established procedures to monitor and evaluate the performance of third parties with whom it has agreements that include language clauses.

Official languages have not been audited internally since the creation of the directorate responsible for them. However, it is encouraging that the Agency plans to conduct an audit in 2014–2015 of its responsibilities under the Act with respect to identifying, maintaining and staffing bilingual positions, and creating a work environment conducive to the use of both official languages. Our audit is therefore quite timely, as shortcomings have been identified regarding the staffing of bilingual positions, in terms of language requirements, language profiles of bilingual positions and the number of bilingual incumbents required. Parks Canada also needs to examine how it plans for the provision of bilingual services, which affects the quality of services provided in English and French. We encourage the internal audit branch to closely monitor Parks Canada’s progress after implementing the Commissioner’s recommendations in this report.

b) Verify that the results of the monitoring are used in service quality management in order to ensure continued improvement and tangible results.

In terms of monitoring and quality management results, Parks Canada still has work to do, because it has yet to establish formal monitoring mechanisms for all components of Part IV of the Act in order to achieve continued improvement and tangible results.

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.

CONCLUSION

During our audit, we sought to determine whether visitors can receive services of equal quality in English and French at national parks, national marine conservation areas and national historic sites. It also sought to verify whether the measures put in place by the Agency enabled it to fulfill its obligations under Part IV of the *Official Languages Act*.

We concluded that Parks Canada has made considerable efforts in terms of the active offer of bilingual services by creating and implementing the *Hello! Bonjour!* tool kit and integrating this concept into its service standards. We found that the training given regularly to all personnel has instilled in employees the reflex of greeting visitors in both official languages. The Agency had put this promising measure in place in order to correct the problems it was experiencing with this aspect of Part IV of the Act. It is also important to highlight the excellent work done to make extensive information available to Canadians through guides, publications, interpretive signs, videos and electronic communications.

The institution appointed an official languages champion to promote and explain linguistic duality to its Executive Board and to all personnel. It has a structure for official languages management; however, the structure needs to be evaluated to verify whether the program has been implemented effectively throughout the organization. The Agency must establish a formal network of official languages coordinators and define their roles and responsibilities. It also needs to monitor official languages activities more closely in the field units. Our findings led us to conclude that Parks Canada needs to improve the management of its official languages program by developing an accountability framework, a new official languages action plan (complete with timeframes), performance indicators and an accountability mechanism for the program's implementation. Parks Canada also needs to establish a performance assessment program for employees who are required to communicate with the public and who negotiate service agreements with third parties. It should revise its official languages policy in order to better reflect its realities, review and revise the language clauses in third-party service agreements, establish a formal consultation mechanism to determine the specific needs of official language minority communities, and develop formal monitoring mechanisms. It will also need to improve its official languages governance, especially since its activities are decentralized.

Our audit revealed that the Agency still has some challenges in terms of service delivery, mainly due to the size of the geographical area that it serves and partly due to the fact that employees are located at entrance points far away from each other. Our meetings with employees and our observations at sites targeted by the audit produced varied results. In some national parks, we noted shortcomings in the bilingual delivery of activities and interpretive programs and in the planning for the provision of bilingual services. Some sites could not provide services in the minority language for various programs, and others could provide some programs in English or French only if requested in advance, which is not always possible for visitors to do. The Agency has work to do to improve all of its services and to promote linguistic duality. We also found anomalies in the language requirements of bilingual positions, in the language profiles established for positions that involve communicating with the public, and in the bilingual capacity required to provide services of equal quality in English and French to visitors.

Parks Canada must continue to be a leader in linguistic duality by taking specific and concrete measures. It should be able to raise the bar in order to provide visitors with services of equal quality in English and French and to comply with Part IV of the *Official Languages Act*.

The Commissioner has made nine recommendations to help Parks Canada improve the experience of visitors who wish to exercise their language rights. These recommendations, along with Parks Canada's comments and action plan for implementing the recommendations, are listed in Appendix C. We believe that Parks Canada should implement all of the recommendations to fulfill its obligations under the *Official Languages Act* in terms of communications with visitors and the delivery of bilingual services.

APPENDIX A

AUDIT OBJECTIVES AND CRITERIA

OBJECTIVES	CRITERIA
<p>1- ENSURE THAT PARKS CANADA SENIOR MANAGEMENT IS COMMITTED TO IMPLEMENTING PART IV OF THE <i>OFFICIAL LANGUAGES ACT</i> IN ORDER TO PROVIDE VISITORS WITH SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES.</p>	<p>a) Verify that Parks Canada has an official languages accountability framework.</p> <p>b) Verify that Parks Canada's official languages action plan allows for the effective implementation of Part IV of the <i>Official Languages Act</i> with respect to services provided to visitors at national parks, national marine conservation areas and national historic sites, in person, by telephone, in writing, via electronic systems (including the Internet and social media) and through videos.</p> <p>c) Verify that Parks 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 the <i>Official Languages (Communications with and Services to the Public) Regulations</i>.</p> <p>d) Verify that Parks Canada is effective in informing all employees assigned to provide services at various sites, either in person or by telephone, about the requirements regarding service delivery in both official languages.</p> <p>e) Verify that the training modules for Parks Canada employees include the Agency's obligations and employees' responsibilities pertaining to official languages.</p> <p>f) Verify that Parks Canada takes official languages into account in the performance evaluations of senior executives, managers and employees with service delivery responsibilities.</p> <p>g) Verify that partnership agreements with various governments and contracts negotiated with third parties take Parks Canada's language obligations into account.</p>
<p>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.</p>	<p>a) Verify that Parks Canada actively offers and provides services in both official languages at national parks, national marine conservation areas and national historic sites. Verify that the services provided in person, by telephone, in writing, via electronic systems (including the Internet and social media) and through videos are of equal quality in English and French.</p> <p>b) Verify that the bilingual skills of employees at all Parks Canada sites are sufficient to ensure the provision of services of equal quality in English and French.</p>
<p>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.</p>	<p>a) Verify that Parks Canada has initiated an internal reflection process in order to consider the impact of the <i>DesRochers</i> decision on its programs and on how it plans for the provision of bilingual services, and identify how it consults with representatives of official language minority communities in all provinces to determine their service needs and how these communities are informed of the Agency's decisions.</p>
<p>4- ENSURE THAT PARKS CANADA IS EFFECTIVELY MONITORING THE QUALITY OF SERVICE DELIVERY IN BOTH OFFICIAL LANGUAGES AT ALL OF ITS SERVICE POINTS.</p>	<p>a) Verify that Parks Canada has effective monitoring mechanisms (including internal auditing) to ensure that all of its services are of equal quality in both official languages.</p> <p>b) Verify that the results of the monitoring are used in service quality management in order to ensure continued improvement and tangible results.</p>

APPENDIX B

NATIONAL PARKS, NATIONAL MARINE CONSERVATION AREAS AND NATIONAL HISTORIC SITES WHERE OBSERVATIONS WERE MADE ON SITE OR BY TELEPHONE

NATIONAL PARKS	
<i>BRITISH COLUMBIA</i>	Pacific Rim National Park Reserve of Canada Ucluelet
<i>ALBERTA</i>	Banff National Park of Canada Banff
<i>SASKATCHEWAN</i>	Prince Albert National Park of Canada Waskesiu Lake
<i>MANITOBA</i>	Riding Mountain National Park of Canada Wasagaming
<i>ONTARIO</i>	Bruce Peninsula National Park of Canada Tobermory St. Lawrence Islands National Park of Canada Mallorytown Landing
<i>QUEBEC</i>	La Mauricie National Park of Canada Saint-Mathieu Mingan Archipelago National Park Reserve of Canada Havre-Saint-Pierre
<i>NEW BRUNSWICK</i>	Kouchibouguac National Park of Canada Kouchibouguac Fundy National Park of Canada Alma
<i>NOVA SCOTIA</i>	Kejimikujik National Park of Canada Maitland Bridge Cape Breton Highlands National Park of Canada Chéticamp
<i>PRINCE EDWARD ISLAND</i>	No national parks visited in this province.
<i>NEWFOUNDLAND AND LABRADOR</i>	Gros Morne National Park of Canada Rocky Harbour
NATIONAL MARINE CONSERVATION AREAS	
<i>ONTARIO</i>	Fathom Five National Marine Park of Canada Tobermory
<i>QUEBEC</i>	Saguenay-St. Lawrence Marine Park Tadoussac Cap de Bon-Désir Interpretation and Observation Centre Bergeronnes

NATIONAL HISTORIC SITES	
<i>BRITISH COLUMBIA</i>	Fort Rodd Hill and Fisgard Lighthouse National Historic Sites of Canada Colwood Gulf of Georgia Cannery National Historic Site of Canada Richmond
<i>ALBERTA</i>	Banff Park Museum National Historic Site of Canada Banff
<i>SASKATCHEWAN</i>	Batoche National Historic Site of Canada Rosthern
<i>ONTARIO</i>	Rideau Canal National Historic Site of Canada Ottawa Laurier House National Historic Site of Canada Ottawa Bellevue House National Historic Site of Canada Kingston
<i>QUEBEC</i>	Fortifications of Québec National Historic Site of Canada Québec City Saint-Louis Forts and Châteaux National Historic Site of Canada Québec City Cartier-Brébeuf National Historic Site of Canada Québec City Grosse Île and the Irish Memorial National Historic Site of Canada Grosse-Île
<i>NEW BRUNSWICK</i>	Fort Beauséjour – Fort Cumberland National Historic Site of Canada Aulac
<i>NOVA SCOTIA</i>	Grand Pré National Historic Site of Canada Grand Pré Fortress of Louisbourg National Historic Site of Canada Louisbourg
<i>PRINCE EDWARD ISLAND</i>	Province House National Historic Site of Canada Charlottetown L.M. Montgomery's Cavendish National Historic Site of Canada Cavendish
<i>NEWFOUNDLAND AND LABRADOR</i>	Port au Choix National Historic Site of Canada Port au Choix

<i>OTHER NATIONAL PARKS AND NATIONAL HISTORIC SITES WHERE OBSERVATIONS WERE MADE BUT NO FORMAL INTERVIEWS WERE CONDUCTED WITH STAFF</i>	
<i>BRITISH COLUMBIA</i>	Mount Revelstoke National Park of Canada Revelstoke Glacier National Park of Canada Revelstoke Kootenay National Park of Canada Radium Hot Springs Rogers Pass National Historic Site of Canada Revelstoke
<i>MANITOBA</i>	The Forks National Historic Site of Canada Winnipeg Riel House National Historic Site of Canada Winnipeg
<i>NOVA SCOTIA</i>	Alexander Graham Bell National Historic Site of Canada Baddeck

APPENDIX C

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

We are satisfied with the measures and timeframes proposed in Parks Canada's action plan, except for the response to Recommendation 8, with which we are only partially satisfied. When conducting formal consultations with official language minority communities, Parks Canada must not only address the question of language, but also increase their own awareness of the communities' specific official languages needs in their capacity as visitors. In addition, the Agency must take these specific needs into account in its delivery of bilingual services. Since the institution plans to give managers training on the *DesRochers* decision, we believe that this training would be an opportunity to communicate the details and methodology for consultations with language communities.

We would like to thank all Parks Canada employees for their cooperation throughout the audit.

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.

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.

Parks Canada's comments and action plan

Agree. As the protector and presenter of the Canadian natural and cultural heritage under its guardianship, Parks Canada is in a unique position to promote the principles of English and French duality in Canadian society. Parks Canada is committed to offering the visitors to its national parks, national historic sites and national marine conservation areas services in their official language of choice, as well as to highlighting the bilingual nature of Canada in the presence of international visitors.

As one of the priorities in its 2012–2015 official languages strategic plan, Parks Canada will develop a results-based management and accountability framework (RMAF) for Part IV of the *Official Languages Act* by the end of fiscal year 2012–2013. This framework, which will be implemented during the fiscal year 2013–2014, will specify the accountability mechanisms and the roles of the managers and employees who provide direct services to the public in the field units and service centres. It will also identify the advisory and monitoring roles of the National Resourcing Programs Unit and describe the coordinating mechanisms which will ensure a consistent implementation of Part IV of the *Official Languages Act* across the organization. The exact form and nature of these coordinating mechanisms will be determined when developing the RMAF on Part IV of the *Official Languages Act* over fiscal year 2012–2013.

As with any corporate document, the RMAF will need the approval of Parks Canada's Executive Management Committee before being implemented.

Commissioner's comments

We are satisfied with the measures proposed in response to this recommendation.

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's comments and action plan

Agree in principle. The draft 2011–2014 Parks Canada Official Languages Action Plan, which was reviewed by the auditor last summer, sets out the corporate practices needed to comply with the relevant parts of the *Official Languages Act*, as well as initiatives to support the official languages program objectives and commitments. It also includes the priorities on which the Parks Canada Agency will focus its efforts during the three-year period covered by the plan. It is a high level strategic document setting the standard of compliance that the whole organization must achieve in order to fulfill its obligations under the different parts of the *Official Languages Act*, allowing operational units the capacity of undertaking specific actions to ensure expected results are achieved. Initiatives contained in the plan also describe the expected goals or results that operational units must achieve, which relate directly to goals at the corporate strategic level.

To facilitate the operationalization of its strategic corporate objectives regarding official languages, Parks Canada will develop, before September 2012, specific, measurable, attainable, relevant and timely (SMART) goals for inclusion in its 2012–2015 Parks Canada Official Languages Plan to help field units and National Office directorates develop their own operational plans. These SMART goals will also be responsive to the recommendations contained in this audit report and will help to address main issues.

The 2012–2015 Parks Canada Official Languages Plan will specify deadlines and accountability related to most objectives and goals. The accountability and timelines associated with this plan, however, will have to take into account the development and implementation phase of the previously mentioned RMAF for official languages (see response to Recommendation 1). This means that some responsibilities and related objectives will not be identified or confirmed before the completion of the RMAF.

Commissioner's comments

We are satisfied with the measures proposed for implementing the new official languages action plan (2012–2015). Parks Canada must also follow up annually on the implementation of this plan and take the measures necessary to correct any problems that are identified.

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's comments and action plan

Agree. Parks Canada will review, update or adapt its policies, directives and guidelines related to official languages so that they reflect the components of the Treasury Board Secretariat's new official languages policy instrument. This will be done progressively as these components are made available to the Agency. For the upcoming 2012–2013 fiscal year, Parks Canada will adopt and adapt the following Treasury Board policies and directives related to Part IV of the *Official Languages Act*:

- Policy on the Use of Official Languages for Communications with and Services to the Public
 - o Directive on the Use of Official Languages on Web Sites
 - o Directive on the Use of Official Languages in Electronic Communications
 - o Directives for Implementing the *Official Languages (Communications with and Services to the Public) Regulations*

A plan will be developed for the communication and training of these new policies, directives and guidelines along with the levels of responsibilities identified in the aforementioned RMAF to be developed in 2012–2013. In the meantime, the revised, updated or adapted policies, directives and guidelines will be made accessible immediately to all employees, in both official languages, through the Parks Canada intranet.

Parks Canada has developed a tool to explain the difference between formal and substantive equality to its managers, as well as to help them to identify the circumstances in which they should consult local official language minority communities, as required by the Treasury Board directive issued subsequent to the *DesRochers* decision. Once this tool is formally approved by Parks Canada's Chief Human Resources Officer, all managers will be trained to implement and use it accordingly.

Commissioner's comments

We are satisfied with the measures proposed for developing and implementing a new official languages policy and directives. We commend Parks Canada's commitment to training managers on the *DesRochers* decision.

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 comments and action plan

Partially disagree. Parks Canada recognizes the importance of its official languages obligations, as well as the responsibilities of its managers and of its employees who serve the public. However, its recently redesigned performance management system is not considered the best way or means to address the issue raised by this audit. Parks Canada's new performance management system follows Treasury Board's guidelines for managing performance of executives and aligns objectives contained in a manager's agreement with the main priorities and strategic objectives that the federal government and the Agency are trying to achieve. The Agency is required to obey the numerous laws and regulations to which it is subject. Respect for the law cannot be viewed as a strategic objective—the law must be respected as a matter of course.

Therefore, Parks Canada will ensure that its managers' and employees' responsibilities in regard to Part IV of the *Official Languages Act* are more properly addressed by the RMAF to be developed during the forthcoming fiscal year (see response to Recommendation 1).

Moreover, all Parks Canada managers and employees are required to demonstrate a series of leadership attributes in order to perform in their current roles and functions. It will certainly be more effective and efficient to address any learning needs related to the *Official Languages Act*, when assessing leadership behaviours and achievements related to applicable laws and regulations. As this type of assessment is conducted on a yearly basis in the course of the performance appraisal process, this will reinforce managers' and employees' commitment in regard to their roles and responsibilities under the *Official Languages Act*.

Commissioner's comments

We agree with Parks Canada's statement that the responsibilities of managers and all employees under the *Official Languages Act* are more appropriately addressed in the RMAF. When setting employees' and managers' official languages objectives, Parks Canada must also ensure it takes into account the provisions related to the negotiation of 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*.

Parks Canada's comments and action plan

Agree. Parks Canada acknowledges and understands its official languages obligations and is committed to including a specific official language clause in all new service agreements, as well as in those that are being renewed, with any third party providing services on its behalf.

Commissioner's comments

We are satisfied with the measures proposed in response to this recommendation.

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.

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.

Parks Canada's comments and action plan

Agree in principle. As recommended by the Commissioner, Parks Canada will undertake a comprehensive review of the planning for the provision of bilingual visitor services at all national parks, national marine conservation areas and national historic sites. This will be done during the implementation phase of the aforementioned RMAF and is expected to take place in fiscal year 2013–2014. The review will result in an action plan showing how Parks Canada will proceed to address any noted or observed shortcomings. This action plan will then be implemented during the fiscal year 2014–2015.

As for the availability of activities and interpretive programs in both official languages, Parks Canada will study how the concept of substantive equality may help the Agency to develop innovative means of delivery of its interpretative programs, resulting in a more satisfactory experience for both official language communities. Parks Canada's goal is to provide members of official language minority communities with the same level of enjoyment as members of the official language majority community. This study will also take place during the implementation phase of the aforementioned RMAF in 2013–2014, and its results will guide Parks Canada's future decisions in this regard.

Commissioner's comments

We are satisfied with the measures proposed in response to this recommendation. However, we believe that measures could be implemented sooner, particularly those regarding planning, assignments and the work schedules of Visitor Services attendants and interpreters, in order to provide services of equal quality in English and French.

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.

Parks Canada's comments and action plan

Agree. Parks Canada intends to conduct an in-depth review of the linguistic capacity of all its operational units that welcome the public or respond to information requests in person within national parks, national marine conservation areas and national historic sites or by telephone or e-mail. The assessment of the linguistic capacity will take into account all resources to meet these needs in a complete, appropriate, uninterrupted and timely manner, in either English or French. This project will be added to the 2012–2015 Parks Canada Official Languages Strategic Plan.

Commissioner's comments

We are satisfied with the measures proposed in response to this recommendation.

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.

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.

Parks Canada's comments and action plan

Agree. Parks Canada intends to continue taking positive measures within its mandate and sphere of jurisdiction to enhance the vitality of the English and French linguistic minority communities, as well as to foster the full recognition and use of both English and French in Canadian society, as required by Part VII of the *Official Languages Act*. In terms of public consultations, Parks Canada consulted with several official language minority communities and other stakeholders in the context of adapting its programs and services to their needs during the latest renewal process. Many field units also regularly participate in activities organized by official language minority communities not only to better understand their needs, but also to develop or maintain relationships with them.

Parks Canada holds public consultations every five years when developing its management plans. Up until now, consultations did not specifically seek to learn the particular needs of official language minority communities, but Parks Canada will look at the possibility of including the language aspect more specifically in these consultations.

In regard to more frequent consultations with official language minority communities as suggested by the Commissioner, the training of Parks Canada managers in the use of its tool to implement the *DesRochers* decision will stimulate more regular contacts when new programs and services are developed (see response to Recommendation 3).

Commissioner's comments

We are partially satisfied with the measures proposed in response to this recommendation. Regarding consultation with representatives of official language minority communities, Parks Canada must not merely look at the possibility of including the language aspect more specifically in the public consultations it holds every five years. The Agency must establish a formal mechanism as quickly as possible for regularly consulting official language minority communities at the national, provincial and regional levels to become aware of their specific activity and programming needs.

OBJECTIVE 4

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

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.

Parks Canada's comments and action plan

Agree. In compliance with Treasury Board guidelines for the preparation of results-based management and accountability frameworks, Parks Canada's RMAF on Part IV of the *Official Language Act* will include a "monitoring and evaluation plan." The key elements of this monitoring and evaluation plan will be:

1. A performance measurement plan outlining the overall measurement strategy and identifying performance targets, associated performance indicators and sources of data;
2. An evaluation plan outlining the overall evaluation strategy and providing a rationale as to why this strategy is proposed.

The monitoring and evaluation plan will be developed by the Recruitment and Retention Branch, responsible for the coordination of official languages programs at Parks Canada, with assistance from and validation by the Office of Internal Audit and Evaluation of Parks Canada. The ultimate goal will be to optimize the Agency's official languages program related to Part IV of the *Official Languages Act*, in terms of relevance, effectiveness, efficiency and economy.

Commissioner's comments

We are satisfied with the measures proposed in response to this recommendation.