

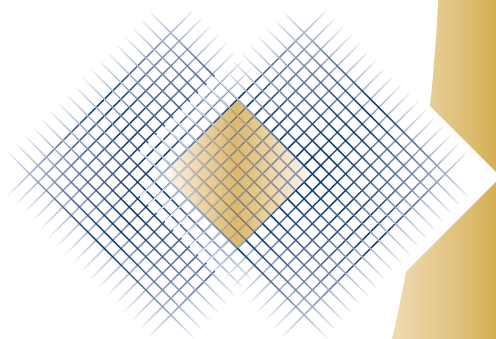


Office of the
Commissioner of
Official Languages

Commissariat
aux langues
officielles

Audit

of the Management of the Official
Languages Program at Public Works
and Government Services Canada



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HIGHLIGHTS

The Office of the Commissioner of Official Languages (OCOL) conducted an audit of Public Works and Government Services Canada (PWGSC) between October 2004 and March 2005. The audit dealt mainly with the management of the Official Languages Program, including senior management's leadership, accountability and commitment to linguistic duality within the Department.

Findings

We found a lack of leadership from senior management in the Official Languages Program. The Department applies Treasury Board's official languages policies, but it does not have a departmental policy to reflect senior management's commitment to official languages. The Department has developed a basic action plan in response to the Commissioner's recommendations, which address systemic problems with the linguistic designation of positions that have been ongoing for a number of years.


Although senior management demonstrated general knowledge of the requirements of the *Official Languages Act*, we noted a lack of awareness of the promotion of and respect for linguistic duality. Employees have a general overview of their rights, yet they do not necessarily invoke them, because the organizational culture is not conducive to the use of French in a number of sectors. Regarding responsibilities, National Capital Region (NCR) employees understand the Department's obligations to varying degrees.

The official languages policies and programs are decentralized. Members of the Official Languages Directorate offer expert services, yet, despite their efforts, they have a limited amount of influence because of a lack of support from the Department's senior managers. Human resources advisors have a general knowledge of the new official languages policies, but they need more training.

Analysis and Recommendations

The responsibility to ensure compliance with the Official Languages Program and policies belongs, without question, to senior management. Senior management must demonstrate more leadership and give the official languages program greater visibility by putting in place measures that will enable the Department to exercise better control of the management of its program, thereby making senior managers accountable.

The Commissioner has made 12 recommendations to PWGSC with a view to improving the management of its official languages program. The recommendations include adopting



a departmental policy, expanding its action plan and preparing an annual report on the achievement of the objectives contained in the plan, communicating the rights and obligations of employees, offering language and retention training, raising managers' awareness of respect for linguistic duality, integrating official languages objectives in performance agreements, and introducing effective control mechanisms. The Department's senior management must demonstrate more leadership and ensure that the management of its program is based on results.

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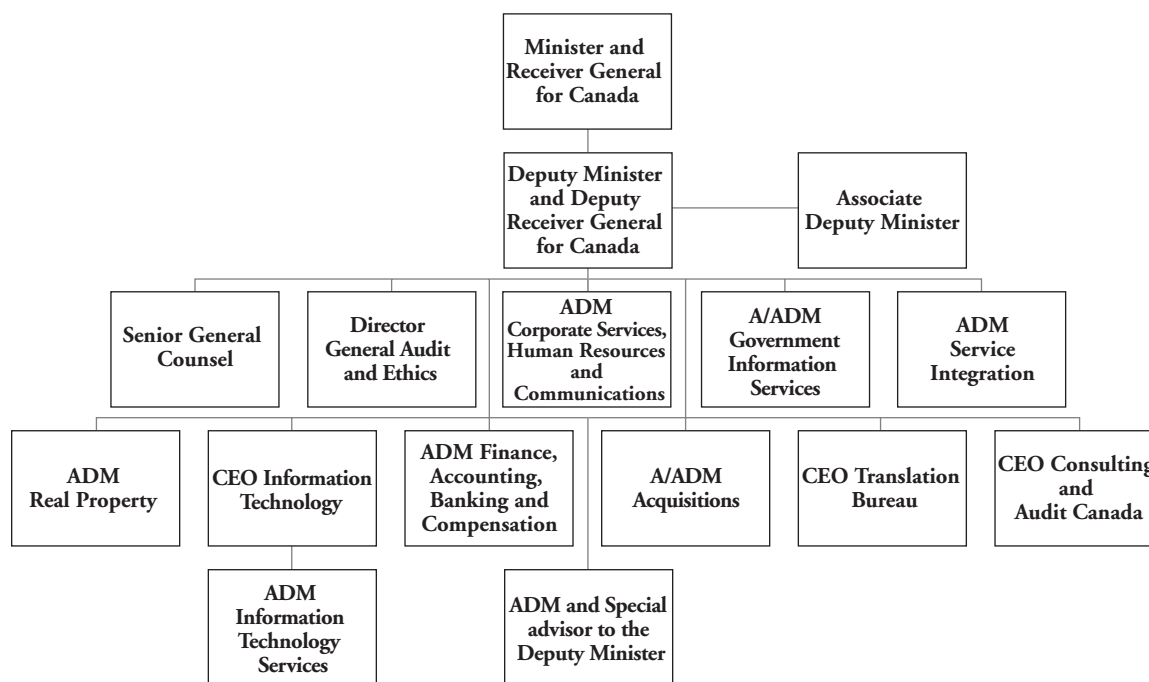
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INTRODUCTION

Department profile

Public Works and Government Services Canada (PWGSC) is the main supplier of central and common services to the Canadian federal administration. Its mission is “to ensure optimum value to government and to Canadians in the provision of modern, efficient, and effective common, central and shared services.”¹ The Department delivers services through a number of service lines.

Public Works and Government Services Canada



Source: Internet site of Public Works and Government Services Canada.

Real Property oversees federal real property through the management of accommodation and holdings by providing specialized advice and professional and technical services to departments and agencies. **Acquisitions** provides common services for procurement of goods and services. **Finance, Accounting, Banking and Compensation** manages the operations of the federal treasury by issuing payments, preparing the Public Accounts and producing the government’s financial statements; it also provides payroll, benefits and pension plan administration services.

1. 2004–2005 and 2005–2006 Estimates: Report on Plans and Priorities, Public Works and Government Services Canada.

Information Technology Services provides the electronic infrastructure and on-line access to information and government services in its operations. **Government Information Services** provides Canadians with multichannel access to information on Government of Canada programs and services. **Service Integration** is the main intermediary between PWGSC and the other departments, and is responsible for the national integration of the Department's services and regional service delivery.

Corporate Services, Human Resources and Communications provides operational services to other sectors in the Department. These include infrastructure and support services, such as information and technology management, policy advice and guidance, communications and security, and administrative and human resources services.

The Department also includes two special operating agencies (SOAs). The **Translation Bureau** provides translation, terminology, revision and interpretation services to federal departments and agencies, and **Consulting and Audit Canada** offers management, accounting, assurance, and audit services to these same departments and agencies.

On March 31, 2005, PWGSC had 12,665 employees. This figure includes 8,130 employees who work in the National Capital Region; the balance of the workforce is located in the five regions: Atlantic, Quebec, Ontario, Western and Pacific. The proportion of designated bilingual positions within the Department rose from 54.3% in 2004 to 65% in March 2005. The Department has 7,194 designated bilingual positions, in which 6,558 incumbents (91%) meet the language requirements. There are 1,700 bilingual supervisory positions in which 1,493 incumbents (87.8%) meet the language requirements of their positions. However, as this report reveals, language requirements of positions are not always determined objectively.

Environmental background

In the last three years, the Department has undergone changes that aim to identify innovative ways to provide more efficient services and improve the way the government does business. These changes will affect the way business is done in the real property, procurement and information technology sectors. Although PWGSC assures us that the work environment and bilingual services to the public are important components that will be factored into the organizational changes, the Department is not yet in a position to identify the impact that these changes will have on the workforce overall, nor on the management of its official languages program.

Essentially, this audit focusses on the management of the Official Languages Program, including the implementation of section 91² of the *Official Languages Act*.

PWGSC was informed of this audit on August 6, 2004. In October 2004, we submitted the objectives and methodology for the audit to the Department's Human Resources Committee. From December 2004 to February 2005, we conducted interviews with assistant deputy ministers, senior and middle management executives, advisors and directors in human resources and official languages, and employees. We held 94 interviews at Headquarters and more than 40 interviews in the Montréal, Halifax, Moncton, and Shédiac regional offices. Moreover, we reviewed more than 50 senior executive performance assessments and more than 20 staffing files.

Our findings and recommendations also result from the analysis of documents provided by the Department and key reports, such as the Report on Plans and Priorities, the Performance Report, the corporate plans of branches and regions, and the official languages annual reports submitted to the Public Service Human Resources Management Agency of Canada (PSHRMAC) and to Canadian Heritage. We also examined the management and control procedures and systems implemented by the Department with respect to its official languages program. A debriefing session was held on June 14, 2005, with the Assistant Deputy Minister, Corporate Services, Human Resources and Communications; the Director General, Official Languages, Staffing, Employment Equity and Learning; the Official Languages Champion; and the Director, Official Languages.

We are very grateful for the wonderful co-operation received from everyone involved in the audit, especially the members of the Official Languages Directorate.

4 | 2. Section 91 of the Act stipulates that “Nothing in Part IV or V authorizes the application of official language requirements to a particular staffing action unless those requirements are objectively required to perform the functions for which the staffing action is undertaken.”

1. MANAGEMENT FRAMEWORK FOR THE OFFICIAL LANGUAGES PROGRAM

Like all of the federal institutions, PWGSC is required to submit to the Public Service Human Resources Management Agency of Canada (PSHRMAC) an annual report that addresses parts IV (Communications with and services to the public), V (Language of work), and VI (Participation of English-speaking and French-speaking Canadians) of the *Official Languages Act*.

The Official Languages Accountability and Co-ordination Framework also establishes the fulfilment conditions that apply to the institutions designated in the 1994 Accountability Framework for the implementation of Part VII of the Act (Advancement of English and French) across the Government of Canada. The goal of this commitment is to ensure that federal institutions participate actively in the development and advancement of official language minority communities. PWGSC is one of 33 institutions considered to have a major impact on these communities. It must, therefore, submit to Canadian Heritage an action plan and an annual report of the implementation of section 41,³ Part VII of the Act.

a) Policy on Official Languages

PWGSC found no need to develop its own policy to cover all aspects of the Official Languages Program, because it applies the policies put in place by Treasury Board.⁴ However, in 1998, it adopted a more limited departmental policy, which deals with the component on Language of Work in Bilingual Regions.

In our view, this action is insufficient. The Department should have a policy that encompasses all of the components of the Act and reflects senior management's commitment to the objectives of the Act.

Recommendation 1

The Commissioner recommends that Public Works and Government Services Canada develop an official languages policy that covers all of the components of the Official Languages Program and that it distribute this policy to all of its employees.

3. The Government of Canada is committed to enhancing the vitality of the English and French minority language communities in Canada and supporting and assisting their development, and fostering the full recognition and use of both English and French in Canadian society.

4. On April 1, 2004, Treasury Board adopted new policies on official languages: the Policy on Official Languages for Human Resources Management and the Policy on Language of Work.

b) Annual report on the implementation of Parts IV, V, and VI of the Act

As required of all federal institutions subject to Parts IV, V, and VI of the Act, PWGSC submits an annual report of its achievements to the Public Service Human Resources Management Agency of Canada.

The Agency provides a template that specifies certain aspects such as leadership, service to the public, monitoring activities, and so on. The information expected involves mostly quantitative criteria and the institutions' achievements in matters of official languages. The template does not address issues that could point out severe problems and their underlying causes.

In its most recent annual report, the Department reported on its achievements and the progress it has made, but it did not perform a critical analysis of the results obtained or the issues that could become problematic. For example, the section on leadership does not contain an assessment of managers' ability to create an organizational culture that reflects the use of both official languages. In the section on monitoring activities, PWGSC addresses internal auditing by reporting on the audits carried out by PSHRMAC and OCOL, which we view as external agencies. It is our opinion that the Department should integrate official languages in its internal audits.

This review was developed by the Official Languages Directorate in co-operation with the regional co-ordinators. Although it was approved by the Deputy Minister, it lacks visibility, because it was not discussed at any senior management committee.

PWGSC should maximize the use of the annual reports it submits to the central agencies as management tools by making them more visible to the Executive Committee.

Recommendation 2

The Commissioner recommends that Public Works and Government Services Canada submit to PSHRMAC an annual report of an expanded action plan for official languages that is based on the analysis of results achieved, after it has been discussed and approved by the Executive Committee.

c) Annual report on the implementation of Part VII of the Act

PWGSC submitted a three-year action plan to Canadian Heritage for 2002–2005. A review of this plan and the three annual reports shows that, overall, the Department implemented the planned initiatives. However, the information provided about the results achieved does not assess the impact of the initiatives on the enhancement of the minority language communities, nor on fostering the full recognition and use of both English and French in Canadian society. The Department should include in its annual report the impact of its initiatives on minority language communities and assess the effectiveness of its initiatives. PWGSC must submit its three-year plan for 2006–2009 this year.

Although it is not addressed in the three-year plan for 2002–2005, the Department's most recent report describes the way in which it fulfils its responsibilities on the use of official language minority media by all federal institutions. The complaints received by OCOL involving the failure of institutions to use the official language minority press⁵ represent, year after year, 15% of all complaints involving the service to the public. In 2002, the Commissioner published a study in which she made six recommendations to PWGSC and to Communication Canada (which is now the PWGSC's Government Information Services Branch) to improve their performance in this respect. The 2005 follow-up of the OCOL study shows that the implementation of three of the six recommendations concerning PWGSC is still under way.

In its role as a key common services agency, PWGSC can influence other government departments on the use of the minority press and should integrate the related initiatives in its next action plan. This report, produced by the Official Languages Directorate with the co-operation of the regional co-ordinators, follows the same approval process as the report submitted to PSHRMAC and is not discussed in any senior management committee.

Recommendation 3

The Commissioner recommends that Public Works and Government Services Canada submit to Canadian Heritage an annual report that contains an analysis of the results achieved vis-à-vis the development of the minority language communities and the promotion of both official languages, after it has been discussed and approved by the Executive Committee.

5. *The Use of the Official Language Minority Press by Federal Institutions*, study and follow-up, Office of the Commissioner of Official Languages, 2002 and 2005.

d) Strategic Action Plan for Official Languages

PWGSC developed a Strategic Action Plan for Official Languages in response to the recommendations made by the Commissioner to rectify a systemic problem on the linguistic identification of positions in the Real Property Branch.

Between 2002 and 2004, OCOL conducted two investigations⁶ on 29 complaints regarding the linguistic identification of positions. The results revealed that the language requirements for a number of positions had not been identified objectively, contrary to section 91 of the Act, which reflects a serious systemic problem.

In February 2003, in response to the Commissioner's recommendations, the Department's Executive Committee adopted the Strategic Action Plan for Official Languages (2003–2006), which aims to enhance its bilingual capacity, make directors accountable, raise managers' awareness of the values linked to official languages, and ensure that employees understand the importance of offering services in both official languages as employees of a central common services agency.

We acknowledge the importance of the plan to improve the program's management; however, we believe that it should be expanded to include all the components of the Department's official languages program. Moreover, we note that some activities identified have not yet been carried out.

For example, the strategies that were to define some of the branches by March 31, 2004, are still in the draft stage, and the content quality of the action plan varies considerably between branches. The Strategic Action Plan provided for the creation of a communications plan by December 31, 2003, and the implementation of service standards by April 1, 2004. As of early 2005, these actions had not yet been initiated. Moreover, the Executive Committee has constantly postponed, since the fall of 2004, a discussion on updating the Strategic Action Plan prepared by the Official Languages Directorate (OLD) after the first year of implementation.

6. *Final investigation report on practices regarding the language identification of positions and their impact and into the lack of service in French from a Real Property Services Managers at PWGSC*, Office of the Commissioner of Official Languages, September 2002 and *Investigation of the linguistic identifications of project manager positions in the Real Property Branch, Professional and Technical Services, Project Management Directorate at PWGSC, Preliminary Report*, Office of the Commissioner of Official Languages, December 2004.

We expected to find clear objectives in this strategic action plan, including specific actions with timelines and areas of responsibility with performance indicators. The plan does not provide for any control measures to ensure that objectives are achieved.

Recommendation 4

The Commissioner recommends that Public Works and Government Services Canada:

- a) expand its Strategic Action Plan for Official Languages to include all of the Official Languages Program components and clear objectives with timelines, and identify the areas of responsibility, performance indicators, and control mechanisms;**
- b) review annually the implementation of the Strategic Action Plan by the Executive Committee.**

2. COMMUNICATING TO MANAGERS AND EMPLOYEES

a) Managers' responsibilities

Senior managers at Headquarters and in the regions have a general knowledge of their official languages responsibilities. They demonstrated that they had a good overview of their responsibilities and general knowledge of the program, policies, and the Strategic Action Plan for Official Languages. A large number of them explained that they had participated in the consultation process at the time the plan was developed.

"I make sure that French is spoken during meetings." [Translation] — Francophone manager, National Capital Region (NCR)

"I must identify the language requirements based on the type of work to be done" — Anglophone manager, NCR

"...delivering service to the public in the public's language of choice." [Translation] — Francophone manager, New Brunswick

"As a director, I must ensure that the language of choice is used, that bilingual services are offered to the public and that the language requirement is appropriate" — Anglophone manager, NCR

"I must ensure that all aspects of official languages are observed and encourage employees to speak in the language of their choice." [Translation] — Francophone manager, Montréal

Official languages information is mainly communicated to senior managers by the Director of Official Languages, who gets invited to do presentations to the Assistant Deputy Minister and to sector committees within the branches. Senior managers then communicate the information to their managers.

Two mandatory courses are also offered. The Management Orientation course covers all of the managers' areas of responsibility through approximately 20 modules, including one on official languages. The Staffing for Managers course includes the Policy on Official Languages for Human Resources Management as of April 2004, further to the Official Languages Directorate's request that it be included. The Orientation course addresses all aspects of the Act, and the Staffing for Managers course deals with official languages in staffing activities. The content of the course was developed at Headquarters; the course is also offered in the regions.

b) Rights and responsibilities of employees regarding official languages

The Official Languages Directorate has shown that the issue of official languages is addressed in the mandatory New Employee Orientation sessions that are offered periodically. Nonetheless, the vast majority of employees interviewed claimed that they did not receive any training on official languages and that they obtained their information from e-mails, the Intranet site or from managers.

Employees in the NCR, Quebec, and New Brunswick have a general understanding of their rights. For example, they know that they can work and be supervised in the language of their choice. However, employees do not necessarily exercise this right, because it is simpler to work in the language of the majority, and managers in the NCR and in New Brunswick are often unilingual Anglophones.

As for their responsibilities, employees in the NCR understand that they must provide services to clients in both languages. However, our findings show that the level of understanding varies widely from one employee to another. Consequently, employees' understanding of the Department's obligation to provide personal and common services in both official languages is called into question.

“I have not received training, but I’ve seen e-mail”
— Anglophone employee, NCR

“I did not receive any training, but where the Department’s obligations are concerned, our director reminds us that we may work in the language of our choosing. However, in practice, it’s another story, given that management is made up of Anglophones,” [Translation] — Francophone employee, NCR

“My official languages responsibilities are limited to dealing with clients in both languages.” [Translation] — Francophone employee, NCR

“I work in client services. I was not informed of my responsibilities, but I found the information on the Internet. I deal with an Anglophone manager and I would feel uncomfortable asking for my assessment in French.” [Translation] — Francophone employee, New Brunswick

“Employees can be supervised in the language of their choice, but they do not ask for it to avoid conflict.” [Translation]
— Francophone employee, New Brunswick

We note, however, that in Quebec and New Brunswick, employees have sound knowledge of their responsibilities and of the Department’s obligations with respect to official languages.

We note that the orientation sessions are designed for new staff members, whereas most of the employees interviewed had been in their position for some time. The Department should ensure that it takes the necessary measures to inform its employees of their official languages rights and obligations on a regular basis.

Recommendation 5

The Commissioner recommends that Public Works and Government Services Canada review its communication strategy to ensure that all staff members have the same understanding of their rights and responsibilities.

3. MANAGEMENT OF THE OFFICIAL LANGUAGES PROGRAM

a) Official Languages Directorate

The Official Languages Directorate (OLD) comprises 12 employees. The Director of Official Languages reports to the Director General, Official Languages, Staffing, Employment Equity and Learning, who reports to the Assistant Deputy Minister, Corporate Services, Human Resources and Communications. The Director manages the official languages program budget and the budget for management and employee language training. The members of the OLD act as official languages consultants. The OLD conducts studies, drafts annual reports, ensures the follow-up on the Strategic Action Plan for Official Languages, co-ordinates second language assessment testing, organizes in-house training, and provides a complaint resolution service.

The Director of Official Languages is the national co-ordinator for parts IV, V, VI, and VII of the Act. Each of the five regional offices and the Shédiac office has a regional official languages co-ordinator. There are also eight additional co-ordinators who are responsible for Part VII. Their official languages duties vary and represent only a portion of their work.

In the regions, the regional official languages co-ordinators provide expert services on official languages. They report to their respective regional offices. In the regions we visited, the employees designated as regional co-ordinators were human resources officers. The roles and responsibilities of regional official languages co-ordinators have not been defined, and a structured internal network of regional co-ordinators does not exist. To help the regional co-ordinators perform their official languages duties to the best of their ability, the Department should define their roles and responsibilities more clearly.

As an advisor, the Official Languages Directorate makes recommendations, but it has limited influence with management, and its monitoring role contributes slightly to improving the management of official languages. However, we expect that the senior managers responsible for official languages will provide a higher level of support to the OLD in its work. For example, the Human Resources Committee, as we note later in this report, should discuss official languages more regularly.

b) Human Resources

Human Resources plays a key role with managers in the implementation of the new Policy on Official Languages for Human Resources Management.⁷ The Official Languages Directorate has organized a training session for human resources advisors, at their request, to help them better fulfil the requests of managers, and, consequently, contribute to the Department's official languages objectives. This ongoing training is expected to begin in 2005 and should also be offered to human resources advisors in the regions.

c) Policy on Official Languages for Human Resources Management

We verified whether the Department complies with the Policy on Official Languages for Human Resources Management and the related Directives.

7. The Treasury Board Policy on Official Languages for Human Resources Management came into effect on April 1, 2004. The departments and agencies subject to it are required to apply this policy and the related directives that address language requirements, staffing bilingual positions, and language training.

The **Directive on the Linguistic Identification of Positions or Functions** stipulates that:

The language requirements of positions or functions are determined objectively.

The language requirements reflect the duties of employees or their work units as well as obligations with respect to service to the public and language of work.

Positions or functions at the assistant deputy minister level and other assistant deputy head titles across Canada and those of members of the Executive Group in regions designated as bilingual for language of work purposes are identified as bilingual at the “CBC⁸ level or above.”

A review of staffing files revealed the following deficiencies:

- the file does not always contain a justification for changing the profile;
- the files audited do not show whether the new profiles were determined objectively; and,
- the incumbent’s second language proficiency always corresponds with the new revised profile for the position.

These findings cast doubt on the objectivity exercised in determining the language requirements for the positions. In this respect, we have received more than 60 complaints since January 2001.

In 2004, the OLD carried out a study on the language proficiency required for bilingual positions. The study found that 64.4% of bilingual positions were at the BBB proficiency level, a proportion that is too high. The Department agreed to review the linguistic profiles of positions designated as bilingual for members of the feeder group. For example, we noted that the Halifax office posted a competition for the position of Regional Director, Human Resources (PE-06) with a BBB proficiency level. We also noted that the position of Regional Manager, Resourcing and Compensation, was designated BBB, while the human resources advisor positions were all designated English essential. Furthermore, we are presently investigating two competitions for positions at the EX-05 level. Even though the competitions are posted as imperative staffing, the job bulletin indicates that should a bilingual candidate not be available, both positions will be filled by candidates who do not satisfy the linguistic profile.

8. CBC: the first letter represents reading, the second one writing and the third one oral interaction.

Further, we noted that the Interchange Canada program, administered by the Public Service Commission, involved a large number of participants. The program promotes a better understanding between the public and private sectors and provides an opportunity to exchange specialized knowledge in fields of expertise. The positions of Interchange Canada participants are unclassified, and the determination of a linguistic profile for the position is not mandatory. We found that out of 23 participants, 18 were all in the same branch (6 of them in EX positions) and only a small number met the language requirements of their positions. We feel that such a situation may create problems with respect to language of work and promoting linguistic duality.

Recommendation 6

The Commissioner recommends that Public Works and Government Services Canada require that subdelegated managers⁹ justify in the staffing files the language requirements of the positions based on the criteria of the Public Service Commission guide Determining the Linguistic Profile for Bilingual Positions.

The Directive on the Staffing of Bilingual Positions stipulates the following:

Bilingual positions are staffed imperatively.¹⁰

In exceptional cases, non-imperative staffing may be considered; justification must be provided in writing and the staffing action must be approved by the Deputy Minister or the Assistant Deputy Minister.

When the Directive came into effect, the Department created an Authorization request for non-imperative staffing form, whereby managers simply check off one of two options to justify the non-imperative staffing action. We believe that this process encourages managers to depart from the policy and consequently does not respect the spirit of section 91. Managers should be required to justify their decision to opt for non-imperative staffing in more detail.

9. “Subdelegated manager” refers to an employee who occupies a designated position and is the decision maker as defined in PWGSC departmental policy on subdelegation of staffing authority.

10. Imperative staffing means that the incumbent must meet the requirements of the position’s linguistic profile at the time of the appointment.

Part II Criteria for non-imperative staffing
<input type="checkbox"/> The potential bilingual applicant pool is very limited due to the highly specialized nature of the duties and the knowledge needed for a position and where imperative staffing might unduly limit applications for the position.
<input type="checkbox"/> The institution would receive an insufficient number of applications from members of one or the other official language community, and non-imperative staffing is likely to promote participation of the under-represented community
For criteria other than those above, please indicate your justification.

Source: Authorization request for non-imperative staffing (see Appendix D).

We also wanted to verify whether non-imperative staffing actions had been used only in exceptional circumstances since April 1, 2004. However, according to the data provided in Table 1, the data for 2004–2005 includes appointments and transfers, whereas the data for the previous year covers appointments only.

Table 1

Appointments ¹	Imperative	Non-imperative	Total
April 1, 2003 to March 31, 2004	932 (76%)	294 (23.9%)	1,226
Appointments/Transfers ²	Imperative	Non-imperative	Total
April 1, 2004 to March 31, 2005	2,987(75.3%)	976 (24.6%)	3,963

1. Data for 2003–2004 includes appointments to indeterminate positions only.

2. Data for 2004–2005 includes appointments and transfers to indeterminate and term positions of three months or more.

Given the April 2004 effective date for the new policies and the changes made to the calculation method for positions staffed non-imperatively, it is not possible to determine whether the number of positions staffed on a non-imperative basis has decreased. The Department should be able to keep track of its imperative and non-imperative staffing actions.

Despite the Commissioner’s recommendations and the new Treasury Board policies, the Department does not always determine linguistic profiles objectively, and imperative staffing is not always the norm.

Recommendation 7

The Commissioner recommends that Public Works and Government Services Canada:

- a) modify its Authorization request for non-imperative staffing form in order to require managers to justify with more details their decision to opt for non-imperative staffing;**
- b) continue to monitor and to maintain up-to-date statistics on their non-imperative staffing actions in order to measure whether imperative staffing is becoming the norm.**

The Directive on Language Training and Learning Retention stipulates the following:

Language training is required immediately upon appointment in a non-imperative staffing situation.

Language training is integrated into career development and recruitment and development programs.

The Department has no departmental policy or training plan for language training and learning retention. Although priority is given to those who have statutory obligations, managers and employees cited a long waiting period for access to training. In January 2005, 183 employees in the Department were on a waiting list with the Canada School of Public Service.

Overall, 82% of employees have a learning plan. The Department invited employees to enrol in language training for professional development purposes. Criteria were developed to help the employees who were receiving discretionary language training make their selections. However, it is too soon to assess the results of this measure. The Department offers basic training, development, and learning courses internally to employees on a part-time basis. In 2004–2005, 1,521 employees attended these courses.

Despite the language training that is offered, our interviews revealed a number of problems: many employees (with statutory obligations) are waiting for training, managers postpone employee training for operational reasons, and employees returning from language training have difficulty retaining their second language skills.

Recommendation 8

The Commissioner recommends that Public Works and Government Services Canada develop a language training and learning retention policy and plan, and report on the progress it has made in implementing this plan in its annual report.

4. COMMITMENT AND ACCOUNTABILITY OF MANAGERS

The leadership shown by senior managers and the critical role played by managers in their immediate work environment with respect to linguistic duality has a strong influence on the organizational culture of the institution. This is an obvious, indisputable fact raised by the Commissioner in one of her studies on language of work in bilingual federal workplaces.¹¹

a) Leadership and organizational culture

We verified whether the leadership shown by senior management is reflected in the organizational culture, thus giving English and French the standing that is warranted.

PWGSC has an official languages champion who is a senior manager. She represents the Department in the network of official languages champions, sits on the Departmental Advisory Committee on Official Languages, and participates in events such as Francophonie Day. Unfortunately, the interviews revealed that the official languages champion and her role were not known within the Department. PWGSC must also define the role it wishes to give the official languages champion and give her enhanced visibility so that she may have more influence with senior management.

One distinctive feature of the Department is that its various divisions operate independently of one another. The organizational culture and the importance placed on official languages vary widely from one branch to another.

Senior management was unable to demonstrate that it had established a horizontal organizational culture based on the promotion of linguistic duality and respect for language rights. Although senior management assures us that the Official Languages Program is an important component that will be factored into the organizational changes, several managers are of the opinion that the management of the Official Languages Program is not receiving the attention it deserves. Moreover, most of the assistant deputy ministers are not familiar with the government's *Action Plan for Official Languages*, and even fewer are aware of its impact on the Department. The employees who were interviewed claimed unanimously that there is no real commitment to changing the organizational culture from an official languages perspective.

11. *Making it Real: Promoting Respectful Co-existence of the Two Official Languages at Work*, Office of the Commissioner of Official Languages, 2005.

“The English-speaking community is larger, the meetings are always conducted in English. Sure, it’s promoted, but applying it is another matter.” [Translation] — Francophone employee, NCR

“Yes, it reflects the linguistic duality, but are we comfortable speaking the language of our choice during meetings...” [Translation] — Francophone employee, NCR

“The culture here is unilingual English. Everything is in English. I can express myself in the language of my choice, but in meetings, it’s very intimidating.” [Translation] — Francophone employee, NCR

“Organizational culture is not a reaction. Even though there are many Francophones at the table, the leader must set the example.” [Translation] — Francophone manager, Montréal

“Officially, linguistic duality appears to be reflected, but really it is not.” [Translation] — Francophone employee, Shediac

Some examples cited include the fact that unilingual English documents are circulated for comments; courses are not always available in French; French is used very little or not at all during meetings; the information distributed is not always bilingual, particularly when it comes from middle management; and software applications translated into French are a long time coming and are often of poor quality.

The interviews at Headquarters showed that there is a positive trend toward linguistic duality, but the organizational culture overall does not give French the standing that is warranted. This sentiment was echoed during our visits to New

Brunswick and Montréal—except that in Montréal, the situation favours French over English, as explained in the Commissioner’s study on language of work.¹²

Managers are not made aware of linguistic duality and respect for official languages.

Recommendation 9

The Commissioner recommends that Public Works and Government Services Canada demand that managers (EX group and members of la Relève) be mandated to attend awareness sessions on linguistic duality and respect for official languages.

b) Governance Committees

The Department has a number of governance committees. We reviewed the mandates of four of these committees, given that—according to the managers interviewed—official languages are discussed.

Governance Committees¹³

Committees	Members	Mandates
Executive Committee	Chair: Deputy Minister Members: Associate Deputy Minister, assistant deputy ministers (ADMs), chief executive officers (CEOs), Senior General Counsel, regional directors general, directors general, Audit and Ethics, Communications and Executive Secretariat	Inform senior departmental managers of departmental and governmental issues, priorities and activities.
Management Board	Chair: Deputy Minister Members: Associate Deputy Minister, ADMs, CEO Infotechnology, Senior General Counsel and Director General, Audit and Ethics	Set departmental priorities and direction; Approve corporate risk management and performance management framework; Monitor progress of key branch results; Review the departmental financial and resourcing situation; Consider and approve the recommendations of the Departmental Operations Committee.
Departmental Operations Committee	Chair: Associate Deputy Minister Members: ADMs and CEOs	Review all major or sensitive proposals, recommend for approval by Management Board; Review memoranda to Cabinet and Treasury Board submissions with strategic implications for the department to identify key issues and help ensure consistency with departmental strategic directions; Review major capital projects and other major initiatives in procurement, infotechnology and real property; Review corporate/branch business plans, risk management and performance management frameworks, and recommend for approval of the Management Board; Review selected operational activities with potential high and/or sensitive impact and provide advice to the Deputy Minister.
Human Resources Committee	Chair: Assistant Deputy Minister, Corporate Services, Human Resources and Communications Members: ADMs, CEOs and one regional director general representing the regions	Recommend strategic human resources directions and priorities for the departmental plan for the department's evolving human resources requirements; Determine corporate training frameworks and requirements, recruitment and retention strategies.

13. PWGSC Governance Committees Structure – *The Source* intranet Site - PWGSC

We reviewed these committees' records of decisions, and we noted that the issue of official languages is most often discussed by the Executive Committee; we found very few or no discussions on official languages by the other committees.

For example, in 2002–2003, the Executive Committee carried out two follow-ups on the progress of the enhancement of language requirements for the EX category, approved the Strategic Action Plan for Official Languages, and recommended that a strategy be developed to ensure monitoring of official languages; the Committee members also met with the Commissioner of Official Languages. Since 2004, the Executive Committee has constantly postponed a discussion on the follow-up of the Strategic Action Plan from one meeting agenda to the next.

Furthermore, as mentioned above, we noted that the Committee did not address the annual reports submitted to PSHRMAC and Canadian Heritage. We feel that it is important to do so to establish a link with the Strategic Action Plan. Official languages should not only be discussed when exceptional circumstances arise, but be a part of the regular discussions of the Executive Committee, which includes the Deputy Minister, the Associate Deputy Minister, the assistant deputy ministers, presidents and chief executive officers, and the regional directors general.

The Executive Committee discusses official languages only when exceptional circumstances arise.

In July 2004, the Real Property Branch (RPB) created an official languages committee in response to the problems relating to the identification of linguistic requirements for positions. Its mandate is to ensure that the branch's action plan for official languages is implemented and applied consistently, and to inform the RPB's Management Committee of any problem relating to official languages.

The Committee comprises 12 members: 1 president, 8 middle managers and 3 human resources representatives. The President acts as a representative of the Assistant Deputy Minister and the RPB's Management Committee regarding any issue involving human resources. We applaud this sound initiative and strongly encourage the Committee to carry on with its activities. However, senior executives and managers are responsible for official languages, and we feel that the Official Languages Committee should include the members—or, at the very least, some members—of the RPB's Management Committee.

Recommendation 10

The Commissioner recommends that Public Works and Government Services Canada add periodic discussion of official languages to the Executive Committee’s mandate.

c) Performance agreements

The Deputy Minister informed senior management of the Department’s priorities and the priorities that managers were to include in their business plans. Except for the Translation Bureau—which demonstrates the importance that should be granted to the Strategic Action Plan—official languages components, if any, are integrated into human resources management.

We noted that 55% of the performance agreements we examined contained official languages commitments; in most cases, these agreements were integrated into human resources management. The staffing actions that involve official languages represent only a portion of the program; service to the public, language of work, and advancement of English and French should also be considered. The Department must make managers accountable and include a component relating to official languages in all performance agreements.

Official languages are not addressed in all of the performance agreements for senior managers.

Recommendation 11

The Commissioner recommends that Public Works and Government Services Canada implement a mechanism to integrate the objectives specific to official languages overall in the performance agreements of all managers (EX group).

d) Control measures

The Department was unable to demonstrate that it had an effective control mechanism in place to assess its performance on official languages. The OLD's monitoring effort is limited and does not appear to be an effective mechanism for influencing the management of the Official Languages Program. The Internal Audit Services Directorate could play a key role, but it feels that this is not one of its mandates and it does not consider the Official Languages Program in its risk chart. The Department operates reactively, rather than proactively, with regard to any aspect of official languages. We can, therefore, note that the Department lacks the control measures needed for the Official Languages Program.

Recommendation 12

The Commissioner recommends that Public Works and Government Services Canada:

- a) develop an official languages accountability framework;**
- b) create effective official languages monitoring and control mechanisms;**
- c) include official languages in internal audits.**

CONCLUSION

In this audit, we determined whether the implementation of PWGSC's Official Languages Program was compliant with the *Official Languages Act*. We checked whether the institution communicated the appropriate information to its managers and employees with respect to their official languages rights and responsibilities. We also observed the role of the Official Languages Directorate and the contribution made by human resources in achieving the official languages objectives. We verified whether the Department had a monitoring mechanism in place to ensure the management and control of its plans and its Official Languages Program. We checked whether the organizational culture reflected linguistic duality and whether a mechanism was in place to ensure the managers' commitment and accountability with regard to official languages and identifying the linguistic requirements of positions.

Although some mechanisms have been implemented—production of reports, action plans relating to the staffing of bilingual positions, official languages courses, and so on—the integration of official languages in the organizational culture is incomplete. A higher level of leadership is required from members of senior management to ensure that the integration is complete and to ensure the sound management of the Official Languages Program.

Audit team:
Ghyslaine Rose
Chantal Bois

APPENDIX A

Public Works and Government Services Canada's response to the audit report of the Commissioner of Official Languages on the management of the Official Languages Program

Recommendation 1

The Commissioner recommends that Public Works and Government Services Canada develop an official languages policy that covers all of the components of the Official Languages Program and that it distribute this policy to all of its employees.

Public Works and Government Services Canada (PWGSC) will develop a departmental policy on official languages that will encompass all aspects of the program and, more specifically, parts IV, V, VI and VII of the *Official Languages Act*. Following exhaustive consultations, this new policy will be disseminated to all the employees on its implementation, which is scheduled for June 30, 2006. The policy will stress that objectivity must govern the establishment of language requirements where a staffing action is undertaken (section 91). The policy will further deal with our language training programs and the Department's commitment to its employees concerning continuous language learning.

Action plan

- Consult stakeholders: managers, employees and unions (December 31, 2005)
- Obtain management's approval of the statements in the new policy (February 28, 2006)
- Write draft of departmental policy (March 31, 2006)
- Obtain approval for and implement the new policy (June 2006)
- Implement our communication plan for management and employees (June 2006)

Recommendation 2

The Commissioner recommends that Public Works and Government Services Canada submit to PSHRMAC an annual report of an expanded action plan for official languages that is based on the analysis of results achieved, after it has been discussed and approved by the Executive Committee.

On February 19, 2003, the PWGSC Executive Committee approved a three-year Strategic Action Plan for Official Languages. This plan enabled the Official Languages Directorate to carry out a major awareness campaign, establish actual sector capacities, abolish non-compliant practices, facilitate the transition to demographic rules for our regional points of service and review the language requirements of most of the feeder group positions, among other things.

PWGSC reports its initiatives in its annual reports to the Public Service Human Resources Management Agency of Canada (PSHRMAC). PWGSC feels that its annual reports, while respecting the Agency's template parameters, are detailed and informative. That said, PWGSC will develop a new 2006–2009 action plan that will include the target results and will be discussed and approved by the Executive Committee. Our annual reports will henceforth be approved by this same governance committee.

Action plan

- Obtain results from the measures taken by stakeholders (February 2006)
- Collect and analyse data (March 2006)
- Submit draft to the Agency for feedback (March 2006)
- Submit report to the Executive Committee (April 2006)
- Submit report to the Agency (April 2006)

Recommendation 3

The Commissioner recommends that Public Works and Government Services Canada submit to Canadian Heritage an annual report that contains an analysis of the results achieved vis-à-vis the development of the minority language communities and the promotion of both official languages, after it has been discussed and approved by the Executive Committee.

In May 2005, PWGSC began a major consultation with organizations representing minority language communities. As a matter of fact, PWGSC, in collaboration with Canadian Heritage, met with 28 organizations dedicated to developing the Acadian community in Nova Scotia and Prince Edward Island. This initiative, which aims to explain our programs and define specific community needs, was a resounding success.

The initiative, which is spread over three years, will continue in Manitoba and Saskatchewan next fall. These consultations help to, among other things, establish contacts and, as a result, strengthen our network of regional co-ordinators. This network will help us achieve our objective to better measure the impact of our initiatives on the development of minority language communities. These initiatives are part of a three-year results-oriented action plan that PWGSC presented to the Minister of Canadian Heritage on May 31. We will also count on Canadian Heritage's expertise to better measure results. From now on, the PWGSC action plan and annual report in the spirit of Part VII of the Act will be discussed and approved by the members of the Executive Committee.

Action plan

- Consult Canadian Heritage to obtain a tool to measure results (fall 2005)
- Obtain the results of measures taken (February 2006)
- Collect and analyse data (March 2006)
- Submit draft to Canadian Heritage for feedback (April 2006)
- Submit annual report to the Executive Committee (April 2006)
- Submit report to Canadian Heritage (May 2006)

Recommendation 4

The Commissioner recommends that Public Works and Government Services Canada:

a) expand its Strategic Action Plan for Official Languages to include all of the Official Languages Program components and clear objectives with timelines, and identify the areas of responsibility, performance indicators, and control mechanisms;

As previously mentioned, PWGSC will develop a new 2006–2009 action plan that will address service to the public, language of work, equal participation and the development of minority language communities. This plan, which is scheduled to be implemented on April 1, 2006, will be developed in close collaboration with managers. It will clearly define management's responsibilities with regard to introducing specific measures. In addition, the plan will outline the leadership that is needed to provide services of comparable quality in both English and French to the public and to the departments we serve as a common services agency and to create the conducive environment employees are increasingly coming to expect.

b) review annually the implementation of the Strategic Action Plan by the Executive Committee.

The plan will be approved by the Executive Committee, and an annual update will be submitted to and discussed by its members.

Action plan

- Consult stakeholders: managers, employees and unions (December 31, 2005)
- Obtain management's approval of action plan initiatives (February 2006)
- Implement 2006–2009 action plan (April 1, 2006)
- Implement our communication plan for managers and employees (April 2006)

Recommendation 5

The Commissioner recommends that Public Works and Government Services Canada review its communication strategy to ensure that all staff members have the same understanding of their rights and responsibilities.

The awareness objectives in our 2003–2006 strategic action plan were achieved and even surpassed. In fact, thousands of employees received the training offered in orientation courses for both managers and new employees, as well as through targeted interventions at headquarters and in the regions. Despite the many successes, we are committed to reviewing our communication strategy and making it part of a more comprehensive communications approach to official languages.

To do this, we will consult the members of our networks at a conference that we plan to organize sometime next winter. During this conference, we intend to discuss, among other things, the major role that our networks' members must play. With the support of the Communications Directorate, we will also attempt to enhance the visibility of the Official Languages Directorate's intranet site by posting bulletins on various parts of the Act or on related topics to ensure that all employees have the same understanding of their rights and responsibilities. For her part, our Champion is developing an action plan to increase her opportunities to strategically intervene in the sectors and approach fellow members of various governance committees. Moreover, she was recently named Champion of the PWGSC Managers' Community. This large network of managers will afford us many forums at which we will be able to increase awareness.

Action plan

- Hold a conference on official languages for the members of our networks (February 2006)
- Define the roles of our networks' members (February 2006)
- Implement the initiatives in our communication plan (spring 2006)
- Post bulletins (as of June 2006)
- Hold awareness workshops (as of July 2006)

Recommendation 6

The Commissioner recommends that Public Works and Government Services Canada require that subdelegated managers justify in the staffing files the language requirements of the positions based on the criteria of the Public Service Commission guide Determining the Linguistic Profile for Bilingual Positions.

The staffing and employment equity sector will send a document to all subdelegated managers to stress this record-keeping requirement and, more particularly, to make it clear that decisions must be based on objective criteria. This requirement, as well as the others contained in your report, will be discussed by the Executive Committee and will be monitored. The resourcing officers will also be made aware of the importance of properly documenting files.

Action plan

- Send documents to managers and resourcing officers (October 2005)
- Discuss the objectivity required in designating positions (fall 2005)
- Monitor record keeping (2006–2007)

Recommendation 7

The Commissioner recommends that Public Works and Government Services Canada:

a) modify its Authorization request for non-imperative staffing form in order to require managers to justify with more details their decision to opt for non-imperative staffing;

A new form is already in the consultation stages with stakeholders. The new form, entitled *Justification for the use of non-imperative staffing*, replaces the two choices for justifying non-imperative staffing with a narrative justification of the chosen staffing method. It requires the same approvals as the related policy. We also intend to follow up on these files both formally and informally.

Action plan

- Implement a new form (September 2005)

b) continue to monitor and to maintain up-to-date statistics on their non-imperative staffing actions in order to measure whether imperative staffing is becoming the norm.

were filled using imperative staffing. This is 5% higher than the year before. Although last year we set an objective to reduce non-imperative staffing by 10%, considerations—including the scope of Part VI of the Act and the new demographic rules applicable to our service points in the regions—lead us to believe that imperative staffing is the norm at PWGSC.

Action Plan

- Continue to monitor the rate of use of non-imperative staffing (produce statistics every six months)

Recommendation 8

The Commissioner recommends that Public Works and Government Services Canada develop a language training and learning retention policy and plan, and report on the progress it has made in implementing this plan in its annual report.

An important component on language training and learning retention will be incorporated into the new PWGSC official languages policy, which is expected to be implemented on June 30, 2006. In addition to the \$839,000 that PWGSC devotes to learning retention and the initiative specific to employees in feeder groups, we will require the branches to set up sectoral budgets for their employees. We also plan to reinforce the section on language training related to career development in the annual letter on learning plans. We believe that management will need to support employees more than ever in obtaining language training outside work hours. The aim being continuing to improve, we also plan to ask the roughly 1,500 employees attending learning retention courses to evaluate the quality of their sessions. Finally, we will continue to officially recognize employees who succeed in attaining their positions' language requirements.

Action Plan

- Obtain management's approval of the statements in the new policy, including the language training component (February 28, 2006)
- Write draft of departmental policy (March 31, 2006)
- Put sectoral budgets in place (April 2006)
- Reinforce the section on language training in learning plans (April 2006)
- Develop an evaluation tool for participants (April-June session 2006)
- Obtain approval for and implement the new policy (June 2006)
- Implement our communication plan for management and employees (June 2006)

Recommendation 9

The Commissioner recommends that Public Works and Government Services Canada demand that managers (EX group and members of la Relève) be mandated to attend awareness sessions on linguistic duality and respect for official languages.

PWGSC recognizes the soundness of a strategy to promote awareness of linguistic duality and respect for the official languages for certain managers and members of la Relève. However, the Department would prefer to require sessions for sectors that receive a number of complaints and/or have the lowest satisfaction rates according to the survey that we will conduct on language of work. PWGSC's official languages program is becoming steadily more viable and will continue to do so in the future. PWGSC would like to continue to promote a non-mandatory awareness strategy through the Managers' Community for employees in feeder groups and during management retreats for EX managers.

Action plan

- Conduct a survey on employee satisfaction (winter 2006)
- Target higher-risk sectors (winter 2006)
- Identify collaborative activities with the Managers' Community (May 2006)

Recommendation 10

The Commissioner recommends that Public Works and Government Services Canada add periodic discussion of official languages to the Executive Committee's mandate.

On July 6, the Associate Deputy Minister felt it was important to make the assistant deputy ministers, chief executive officers and regional directors general aware of the complaints against PWGSC this year and in the last few years. We will ensure that Committee members are regularly informed of the trends, challenges and successes of PWGSC's program. As indicated earlier, our annual reports will be approved and discussed by the Executive Committee. The Committee will also discuss this PWGSC official languages program management audit report.

Recommendation 11

The Commissioner recommends that Public Works and Government Services Canada implement a mechanism to integrate the objectives specific to official languages overall in the performance agreements of all managers (EX group).

Objectives specific to official languages will be integrated into EX managers' performance agreements for the 2006–2007 fiscal year. We plan to analyse a sample of agreements in fall 2005. This will be followed in the winter by an evaluation that will use criteria to identify specific objectives for the 2006–2007 fiscal year.

Action plan

- Analyse a sample of agreements (December 2005)
- Evaluate the situation and propose specific objectives to be included in the 2006-07 agreements (beginning of 2006–2007 fiscal year)

Recommendation 12

The Commissioner recommends that Public Works and Government Services Canada:

a) develop an official languages accountability framework;

PWGSC will develop an official languages accountability framework. This framework will define the roles and responsibilities of the various levels of the hierarchy, from the Deputy Minister to the employees. It will assign specific responsibilities to the Official Languages Champion and to certain branches. The framework will be widely disseminated, and its implementation is planned for July 1, 2006. We also plan to strengthen the aspects that relate to official languages in our guide on the responsibilities of managers in Human Resources.

Action Plan

- Consult managers, employees and unions (December 31, 2005)
- Obtain management's approval of the framework statements (February 28, 2006)
- Implement the accountability framework (July 1, 2006)
- Implement our communication plan for managers and employees (July 1, 2006)

b) create effective official languages monitoring and control mechanisms;

Additional resources have been given to the Official Languages Directorate to implement the many measures that need to be taken. These employees will be responsible for monitoring, among other things. We will also attempt to set up a new network, with members from the branches. As well, we will continue to publish statistical reports on positions and staffing in order to maintain the momentum we have built up over the past few years.

c) include official languages in internal audits.

Corporate Services, Human Resources and Communications Branch (CSHRCB) (Official Languages) and Audit and Ethics Branch (AEB) (Internal Audit Services Directorate) will implement an assurance strategy that addresses all of the recommendations in the Commissioner's Report on the Management Audit of PWGSC's Official Languages Program. Specifically, the assurance strategy comprises the following monitoring and auditing projects over a three-year cycle:

- The Departmental Management Action Plan will be included in the quarterly reporting and tracking by the Audit Assurance and Ethics Committee.
- Employee/Managerial Surveys to identify risks and problems with operational sectors across the department. The information will be submitted to and discussed by the Executive Committee.
- CSHRCB (OL) will contract for annual audits of samples of activities, within "Service to the Public" and "Language at Work"; AEB (IASD) will assist in the contracting and reporting.
- Participation in the piloting of the Balanced Scorecard for Official Languages.
- Report to the Executive Committee on the results of the three-year assurance strategy, together with a submission for another three-year assurance strategy.

Action plan

- Develop a three-year response plan (November 2005)

APPENDIX B

Our response to the action plan prepared by Public Works and Government Services Canada

We are satisfied with the positive tone of the response provided by Public Works and Government Services Canada. The undertakings to which the Department has committed as follow-up to the 12 recommendations made by the Commissioner in the report appear appropriate, as do the target dates for their achievement. We are confident that the full implementation of the action plan, within the Department's proposed timeframe, will allow the Department to continue improving the management of its official languages program while also making Canada's linguistic duality an important component of its organizational culture.

APPENDIX C

Audit objectives and criteria

Objectives	Criteria
<p>Objective 1:</p> <p>The policies, plans and programs related to PWGSC's mandate and its official languages program comply with the <i>Official Languages Act</i>.</p>	<p>Criteria 1:</p> <p>PWGSC has an official languages policy; it has a unit responsible for implementing, updating and monitoring the official languages program; PWGSC fulfills its obligations toward the Public Service Human Resources Management Agency of Canada (Parts IV, V, VI) and Canadian Heritage (Part VII); PWGSC has a corporate culture reflecting linguistic duality and promotes English and French equitably in its activities.</p>
<p>Objective 2:</p> <p>PWGSC is setting up the appropriate mechanisms and has the resources required to manage and monitor its official languages plans and program.</p>	<p>Criteria 2:</p> <p>A unit responsible for the Official Languages Program is part of the PWGSC organizational structure; official languages program objectives are integrated into the management operational plan; administration of the official languages program is centralized or integrated into program management.</p>
<p>Objective 3:</p> <p>PWGSC is effectively communicating its official languages policies, plans and programs to its managers (particularly regarding the language requirements of positions) and its employees, and that they know their rights and understand their responsibilities.</p>	<p>Criteria 3:</p> <p>Managers understand their roles and responsibilities regarding the implementation of official languages policies, plans and programs; employees are informed of their language rights with respect to language of work and their responsibilities regarding service to the public and services provided to other institutions as a central agency.</p>
<p>Objective 4:</p> <p>PWGSC has a mechanism in place to assess managers' commitment and accountability regarding official languages.</p>	<p>Criteria 4:</p> <p>Managers have objectives concerning the application of the Act; they report on the results of implementing the official languages program for which they are responsible; a process is in place to assess the performance of managers with respect to their responsibilities.</p>

Objective	Criteria
<p>Objective 5:</p> <p>Human resources management contributes significantly to departmental official languages objectives.</p>	<p>Criteria 5:</p> <p>Human resources ensures that the language requirements of positions are identified objectively by managers based on the positions' duties; the Department helps incumbents of bilingual positions improve their language proficiency and maintain their levels; the Department has a language training policy, process and plan.</p>
<p>Objective 6:</p> <p>PWGSC has measures in place to resolve recurring problems regarding the identification of language requirements of positions.</p>	<p>Criteria 6:</p> <p>Measures are in place to assess management performance in problem areas for identifying the language requirements of positions.</p>

APPENDIX D

Authorization request for non-imperative staffing

Part I - Partie I Information		
Position Title / Titre du poste		Competition No. / N° de concours
Position No. / N° du poste	Classification	Linguistic Profile of Position / Profil linguistique du poste
Branch / Direction générale	Region / Région	Location / Lieu
Part II - Partie II Criteria for non-imperative staffing / Critères pour dotation non impérative		
<p>The potential bilingual applicant pool is very limited due to the highly specialized nature of the duties and the knowledge needed for a position and where imperative staffing might unduly limit applications for the position.</p> <p>The institution would receive an insufficient number of applications from members of one or the other official language community, and non-imperative staffing is likely to promote participation of the under-represented community.</p>		<p>Le bassin de candidats bilingues possibles est très restreint à cause de la nature hautement spécialisée des fonctions et des connaissances nécessaires pour un poste et la dotation impérative pourrait restreindre indûment les candidatures au poste.</p> <p>L'institution recevrait un nombre insuffisant de candidatures de membres de l'une ou l'autre communauté de langue officielle et le recours à la dotation non impérative est susceptible de favoriser une meilleure participation de la communauté sous-représentée.</p>
<p>For criteria other than those above, please indicate your justification. / Pour tout autre critère que ceux mentionnés ci-haut, veuillez formuler une justification.</p>		
Manager's signature / Signature du gestionnaire		Date
Part III - Partie III Authorization / Autorisation		
Assistant Deputy Minister's or Chief Executive Officer's signature / Signature du sous-ministre adjoint ou président-directeur général *		Date
Deputy Minister's signature / Signature du sous-ministre **		Date
<input type="checkbox"/> Approved / Approuvé		<input type="checkbox"/> Rejected / Rejeté

* The Assistant Deputy Minister's or Chief Executive Officer's authorization is required for all non executive positions.

** The Deputy Minister's authorization is required for executive positions.

Note: Temporary administrative measures must be established to ensure bilingual services to the public and to the employees if the incumbent does not meet the language requirements of the position.

