

Commissariat Commissioner of aux langues Official Languages officielles



Office of the

of Canada Post Corporation Services to the Public at **Bilingual Postal Outlets** 

Follow-up

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In May 2004, the Office of the Commissioner of Official Languages published its report *Audit of Canada Post Corporation Services to the Public at Bilingual Postal Outlets*. At that time, the Commissioner set out 14 recommendations to help Canada Post improve its performance in this area.

XECUTIVE SUMMARY

In September 2005, the Office of the Commissioner did a follow-up to assess the extent to which Canada Post had implemented the recommendations and to measure the progress made in delivery of services in the minority community's official language of choice at bilingually designated postal outlets across Canada.

#### Methodology

Between September and November 2005, we visited 67 postal outlets (33 corporate outlets and 34 dealer outlets). The audit addressed active offer over the telephone and in person, service provided in the client's language of choice, signage indicating bilingual services, and printed material.

In addition to the results of our telephone and in-person spot-checks, our findings were also based on the information provided by Canada Post on its progress with regard to the implementation of recommendations made in 2004, as well as the relevant supporting documentation.

#### Implementation of Recommendations

It should be noted that Recommendation 10 no longer applies because Canada Post is no longer part of the Service Canada network of access centres. Of the remaining 13 recommendations, only 4 have been implemented to our satisfaction, 1 is in the process of being implemented, 4 have been only partially implemented, and 4 have not been implemented at all.

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Canada Post has not shown the progress we would have expected in the implementation of the recommendations and in the results of our telephone checks and visits to the postal outlets. One out of two bilingual outlets did not provide active offer over the telephone, four out of five did not make an active offer in person, and one out of four did not provide satisfactory service in the official language of the minority over the telephone and in person. In spite of the measures taken by Canada Post, which mainly include the implementation of a monitoring structure, the results in the field have not shown the desired level of improvement. That is why the implementation of resulting action plans must be monitored more closely and managers must be more accountable in this regard.

#### Canada Post's Response

Canada Post is committed to taking some additional measures to follow up on some of our recommendations. However, most of these new commitments appear vague and do not specify any target date. Among other things, the Corporation is committed to adding a section on monitoring mechanisms to its policy on the language of service, asking a private firm to spot-check the 800 designated bilingual outlets, and taking appropriate measures to ensure that the linguistic clause is respected in the dealership contractual agreement.

#### Conclusion

We are disappointed with Canada Post's lack of progress. It is our view that, as long as the annual appraisal process for managers does not include a separate component on their duty to provide service in both official languages at all times, and as long as failing to fulfill this duty has no impact on their performance pay, no significant progress will be made.

Moreover, Canada Post must ensure that dealer postal outlets comply with the language clause in their contract. The poor performance of its dealers negatively affects Canada Post's overall performance, which remains unsatisfactory.

Canada Post must also review the importance it places on the equality of English and French in delivering its services in light of the new obligations of institutions subject to the *Official Languages Act* (the Act) to take positive measures to promote the equal status of English and French, as well as support and assist the development of official language minority communities.

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In May 2004, the Office of the Commissioner of Official Languages published the results of the *Audit of Canada Post Corporation Services to the Public at Bilingual Postal Outlets*, which included 14 recommendations.

Specifically, the audit examined service to the public at postal outlets because that is where Canada Post has its most frequent contact with Canadians.

In September 2005, the Office of the Commissioner did a follow-up to the audit to assess the extent to which Canada Post had implemented the recommendations and to measure the progress made in delivery of services in the minority community's official language of choice at postal outlets designated bilingual across Canada.



The purpose of Canada's *Official Languages Act* (the Act) is to ensure respect for English and French as the official languages of Canada and to ensure equality of status and equal rights and privileges with regard to their use in all federal institutions. The Act guarantees the right of any member of the public to communicate with and receive available services from federal institutions in either official language. This duty applies to all federal institutions, including Crown corporations such as Canada Post. Canada Post is responsible for taking necessary measures to meet its obligations under the *Official Languages Act* and related Regulations and to apply the policies in the context of its own mandate.

Under the Act and Regulations, Canada Post has bilingually designated postal outlets across the country. It has a network of 7000 postal outlets, including approximately 3000 operated by the private sector on behalf of the Corporation. Close to 800 postal outlets are designated bilingual, and just under 300 of these are dealer outlets that have the same service obligations as the Corporation, as stipulated by section 25 of the *Official Languages Act*.

Services Provided on Behalf of a Federal Institution

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

Source: Section 25, Official Languages Act, 1988

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In July 2005, we informed Canada Post that we intended to conduct a follow-up audit. In August 2005, Canada Post sent us a progress report in response to the 13 recommendations in the audit report. The follow-up audit was conducted between September and November 2005. During this time, we had meetings with the official languages manager and those in charge of Retail Operations, the Mystery Shopper program, and internal audits.

**THODOLOGY** 

Telephone and in-person spot-checks were also conducted during this period at postal outlets designated bilingual. We visited 67 postal outlets (33 corporate outlets and 34 dealer outlets). As shown in the table below, we visited outlets in the four Atlantic provinces, Quebec, Ontario, all the Western provinces and Yukon Territory.

Province/Territory	Corporate Outlets	Dealer Outlets	Total
Prince Edward Island	2	2	4
Newfoundland	2	1	3
Nova Scotia	2	3	5
New Brunswick	3	5	8
Quebec	7	2	9
Ontario	5	9	14
Manitoba	4	3	7
Saskatchewan	5	2	7
Alberta	2	2	4
British Columbia	1	4	5
Yukon Territory	0	1	1
Total	33	34	67

#### Postal Outlets Audited

The spot-checks addressed active offer over the telephone and in person, service provided in the client's language of choice, signage indicating bilingual services, and printed material such as signs, forms, and federal publications. We also wish to stress that services provided over the telephone and in person were checked only in the official language of the linguistic minority.

We also drew our findings from the information provided by Canada Post on its progress with regard to the implementation of recommendations made in 2004, as well as from the relevant supporting documentation. We reviewed the monitoring mechanisms in place and a selection of management performance appraisals, particularly with regard to their official languages responsibilities. The results of our telephone and in-person spot-checks also serve as performance indicators.

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#### Official Languages at Canada Post

#### **Recommendation 1**

Canada Post should ensure that its policy on official languages explicitly includes a section on monitoring mechanisms and responsibilities in order to reinforce the importance it places on serving the public in both official languages.

Canada Post added a paragraph to its Language of Service Policy stipulating that employees responsible for monitoring compliance at postal outlets designated bilingual must ensure that the policy is applied. Internal audits are given as the only example of a monitoring mechanism. We believe that Canada Post's changes should be made more specific by clearly indicating which positions are responsible for ensuring compliance. The policy should also include the other mechanisms for monitoring the quality of bilingual services, such as the Mystery Shopper program and the Sales Performance Review Checklist.

An enhanced policy would better reflect senior management's commitment to using these mechanisms. We therefore consider that Canada Post has only partially implemented the recommendation.

Status of Recommendation 1: recommendation partially implemented.

#### Canada Post's Response

We have included a section on monitoring mechanisms and responsibilities in our language of service policy and our official languages program. We will more clearly define our monitoring mechanisms in our official languages policy documents.

#### Our Response

We are satisfied with these measures, which are expected to be implemented by September 2006. We believe that a better-defined policy that clearly describes the monitoring mechanisms in place will reinforce Canada Post's commitment to serving the public in both official languages by sending a clear message to managers.

#### **Recommendation 2**

Canada Post should conduct a formal review to determine if it has sufficient bilingual resources in place in its regional offices to actively promote official languages objectives.

In August 2004, the official languages manager conducted a survey of regional official languages coordinators to determine whether the available resources were helping them fulfill their official languages responsibilities. Four out of seven coordinators responded that they took a reactive approach because they had other responsibilities. In January 2005, the vice-president of Field Operations sent a follow-up e-mail to the general managers of Regional Operations, requesting that an action plan be prepared in the regions concerned. In May 2005, the official languages manager followed up on this e-mail.

Although a formal action plan was not submitted, the general managers of Regional Operations described by e-mail or orally the measures that had been taken and committed to allocate sufficient resources to the official languages program. Our telephone interviews with the regional coordinators revealed that only one coordinator was still claiming that he did not have enough time to devote to official languages and that no alternatives had been proposed to him.

Since this is the responsibility of the general managers of Regional Operations, they must be held accountable. As indicated in Recommendation 14, we believe that performance appraisals should include specific, measurable official languages objectives based on clear evaluation criteria.

Status of Recommendation 2: recommendation implemented.

#### **Communication of Language of Service Requirements**

#### **Recommendation 3**

Canada Post should formally assess its communication mechanisms to identify additional means of conveying, to employees responsible for corporate outlets and to dealer outlets, the importance of language of service requirements. The Corporation conducted a survey to assess whether *InfoPost* and *InfoMessage*, two internal communication tools, were meeting the postal outlets' communication needs and to measure the effectiveness of these two publications. *InfoPost*, published twice a month, informs retail employees about their workplace. *InfoMessage*, published weekly, is for retail support and management teams. According to the survey, respondents feel that *InfoPost* provides very useful information, and the vast majority of employees read all issues. As for *InfoMessage*, a little over half of the respondents find it useful and it is read by a little over three quarters of the respondents.

Between September 2004 and June 2005, *InfoPost* addressed official languages only twice. Between October 2004 and April 2005, *InfoMessage* addressed them only three times. Since *InfoPost* is an effective way of communicating with postal outlet employees, we believe that Canada Post should address official languages more often in this publication.

Canada Post has not assessed the other mechanisms that it uses or could use (e.g. correspondence, brochures, the Intranet site and awareness-raising sessions) to inform employees of their official languages responsibilities.

#### Status of Recommendation 3: recommendation partially implemented.

#### Canada Post's Response

We continue to inform our counter employees and private-sector dealers of their language of service responsibilities through the use of internal publications, promotional material, and targeted letters. We will review the frequency and positioning of postal outlet communications as well as various other communication vehicles.

#### Our Response

We are still not satisfied with the action taken to implement this recommendation because the audit and follow-up had already identified the lack of regularity in communications with postal outlets about official languages. In our view, the proposed measures are too vague and there is no specific timeframe for implementation.

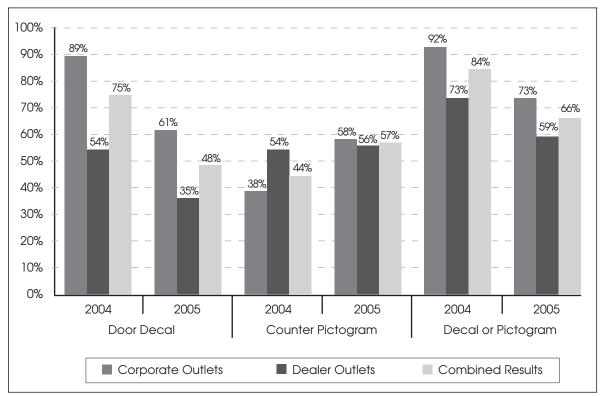
#### Service Provided at Bilingual Postal Outlets

#### **Recommendation** 4

Canada Post should ensure that postal outlets comply with their requirements for bilingual door decals and bilingual counter pictograms and it should ensure that the counter pictograms, when feasible, are permanently affixed where customers can easily see them.

Canada Post uses mechanisms to monitor compliance with requirements for signage indicating bilingual services at postal outlets. The Corporation reminds managers, through *InfoMessage*, of the standards regarding the active offer decals and pictograms. *InfoPost* reminds employees of postal outlets designated bilingual of their obligation to display the decal and the pictogram and how to obtain them. The *Merchandising Quarterly* sales catalogue distributed to postal outlet employees also specifies where to display the decals and pictograms.

Our on-site visits revealed that the percentage of corporate outlets that have a pictogram rose from 38% in 2004 to 58% in 2005, while the situation remains virtually unchanged at dealer outlets (up from 54% to 56%). The total number of postal outlets that have a pictogram increased as a result of the progress at corporate outlets. The percentage of outlets displaying door decals and pictograms dropped at both types of outlet (see Figure 1 on the next page).





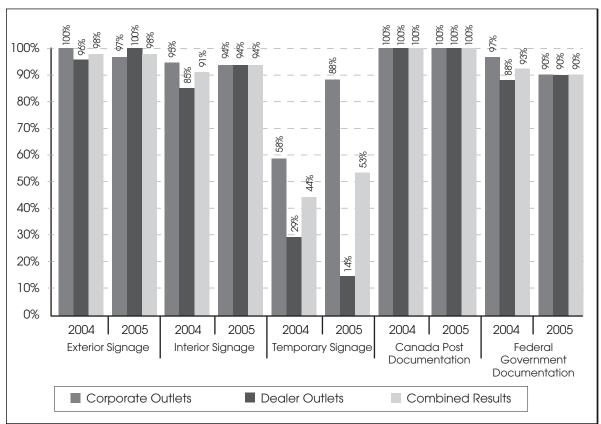
Note: Please refer to Appendix, Table 1, for the 2005 results by province/territory.

The 2004 audit report recognized Canada Post's commitment to indicate to customers the availability of service in both official languages through the door decal and the counter pictogram. However, we regard the display of counter pictograms as crucial as they are located at the actual point where the service is provided. Pictograms are displayed in just over half of the postal outlets designated bilingual. We acknowledge this improvement, but there is still a long way to go before there is full compliance with the provisions of the Act. Consequently, Canada Post should increase the frequency of its reminders about signage and ensure that signs are permanently displayed.

Status of Recommendation 4: recommendation partially implemented.

See Canada Post's response to Recommendation 4 and our response on page 14.

Our spot-checks addressed bilingual signage and documentation at postal outlets designated bilingual. The results reveal that, with the exception of temporary signs, signage and documentation available in both languages at postal outlets continued to show a high rate of compliance (see Figure 2).





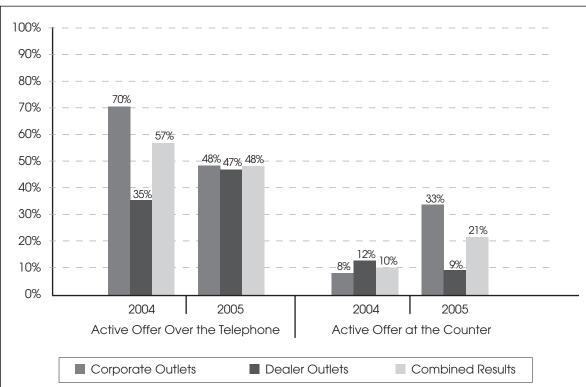
Note: Please refer to Appendix, Table 2, for the 2005 results by province/territory.

#### **Recommendation 5**

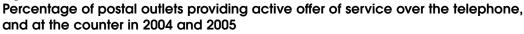
Canada Post should devise a strategy to ensure that bilingual outlets fully comply with the in-person and over-the-telephone verbal active offer requirements.

In 2005, active offer over the telephone in dealer postal outlets improved, increasing to 47% from 35% in 2004. However, the reverse was true for corporate outlets, where active offer over the telephone dropped from 70% to 48%. Overall, active offer over the telephone fell to a little under half of all calls.

Results for active offer in person improved at corporate outlets in 2005, increasing from 8% to 33%. The situation at dealer outlets remained unacceptable, however, falling from 12% to 9%. Active offer in person improved overall, but was provided in less than one quarter of visits, as shown in Figure 3.



#### Figure 3



Note: Please refer to Appendix, Table 3, for 2005 results by province/territory..

After examining the results by province, we noted that in 2004 only the postal outlets in New Brunswick made an active offer in person, whereas in 2005 none of the postal outlets visited in New Brunswick made an active offer in person.

Canada Post has shown very little progress in terms of the active offer.

Status of Recommendation 5: recommendation not implemented.

#### Canada Post's Response (Recommendations 4 and 5)

We will engage a third party supplier to visit all 800 designated bilingual outlets to ensure compliance with the policy regarding bilingual door decals, bilingual counter pictograms and active offer requirements (Recommendation 5). We will install missing signage.

#### Our Response

This is an excellent measure, but it should have a specific timeframe for implementation and should also be used to measure compliance for bilingual service in person and over the telephone. We will assess the results of this exercise by conducting spot-checks of bilingual postal outlets.

#### **Recommendation 6**

Canada Post should review the manner in which it lists postal outlet telephone numbers in telephone directories in order to make the public aware of those that are designated bilingual.

As of February 2006, the telephone numbers of postal outlets designated bilingual will be published in the White Pages of telephone directories. In line with the directories' production cycle, this will likely be completed over the next two years.

Canada Post gave two reasons to explain why not all bilingual postal outlets will appear in telephone directories. First, many postal outlets have only one employee and do not have a dedicated telephone number for postal service. Second, Canada Post leaves it up to the dealer outlet's discretion whether to be listed.

Customers who have Internet access can locate the bilingual postal outlets in any given region or urban centre by typing in the postal code on the Postal Outlet Locator page of the Canada Post Web site. Although this tool also helps users identify all the bilingual postal outlets in Canada, we are not convinced that it reaches the whole of the Canadian population.

Status of Recommendation 6: recommendation in the process of being implemented.

#### **Recommendation** 7

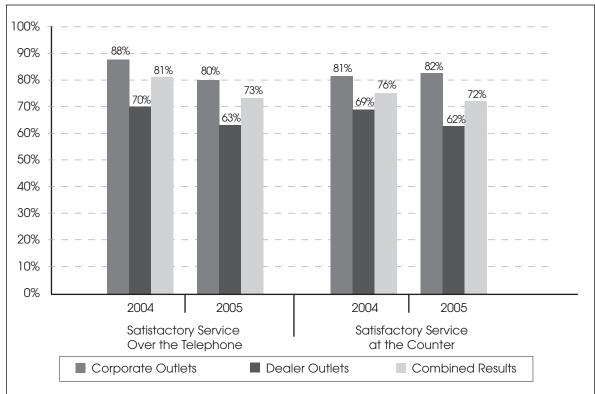
Canada Post must take immediate steps to assess the bilingual capacity of all designated bilingual corporate postal outlets and to ensure they provide services in both official languages.

Canada Post should:

- A- work with the unions to develop solutions that will allow the Corporation to fill bilingual positions on an imperative basis;
- B- require its bilingual counter personnel to obtain the equivalent of a federal public service level-B proficiency in their second language to ensure that a satisfactory level of capacity is maintained;
- C- retest its bilingual counter personnel every five years to ensure they maintain proficiency in their second language; and
- D-review its scheduling procedures to ensure that bilingual counter staff are available during all business hours.

Further to Recommendation 7A, Canada Post sent three letters to the Canadian Union of Postal Workers. As the union has not responded, there have been no discussions on the imperative staffing of bilingual positions. This topic should be put on the agenda for the next collective bargaining sessions.

With regard to Recommendations 7B and 7C, the Corporation maintains its position that its level-A linguistic profile is superior to the level-A profile of the Public Service Commission (PSC). We maintain that the Corporation's level-A is, nonetheless, lower than the PSC's level B, which is the level that is usually required to adequately serve the public. The Corporation feels that its level-A is sufficient to serve customers at postal outlets and does not see the need to require bilingual postal outlet employees to have their language proficiency retested every five years. It is the Corporation's view that informing postal outlet employees of their obligations and implementing monitoring mechanisms is enough to ensure an adequate level of service in both official languages. However, as shown by the results of the follow-up audit in Figure 4 on the next page, corporate outlets have not shown progress in this area.



#### Figure 4 Percentage of Postal Outlets that Provided Satisfactory Service in Minority Language Over the Telephone and at the Counter in 2004 and 2005

Note: Please refer to Appendix, Table 4, for 2005 results by province/territory..

As for Recommendation 7D, the Corporation amended its service standard by specifying that service in both official languages **must be provided at all times**, which has not, however, resulted in any improvement.

The corporate outlet results show that there has been no improvement in service provided in minority language over the telephone or in person.

Status of Recommendation 7: recommendation not implemented.

#### Canada Post's Response

Imperative staffing of bilingual positions will be part of the next round of negotiations with the Canadian Union of Postal Workers (CUPW), to commence in fall 2006.

The current CUPW collective agreement expires in January 2007. During the last round of negotiations with CUPW, an agreement was reached to improve our ability to provide and maintain services in both official languages at the counters. Under the agreement, employees who receive language training are required to occupy their positions for a minimum of 12 months. This will improve continuity of bilingual service. In addition, the Corporation has the ability to staff a position with a bilingual employee while a new incumbent is on language training.

Canada Post is in the process of adopting a new language test to determine the language proficiency of its employees. We will review the language requirements of our counter clerk positions to ensure that the requirements and the processes meet the expectations of our customers and our official languages objectives.

See also our response to Recommendation 4.

#### Our Response

We are encouraged to learn that imperative staffing will finally be discussed in the fall of 2006 in the next round of negotiations with CUPW. Despite the agreement reached with the union in 2004, which was intended to improve continuity of bilingual service in corporate outlets, the results of our follow-up confirm that the Corporation is still not complying with the Act. This suggests that this agreement, while very positive, cannot produce satisfactory results on its own.

With regard to the new language test that Canada Post plans to use and its intention to review the language requirements of counter clerk positions, these commitments seem too vague and leave something to be desired.

#### **Recommendation 8**

Canada Post must take immediate steps to ensure that all designated bilingual dealer outlets provide services in both official languages by:

- A- requiring dealer outlet counter clerks to have the same level of proficiency in their second language as clerks in corporate outlets;
- B- testing potential dealer outlet employees to determine whether they meet language requirements;
- C- making language of service a component of initial instruction provided to those who sign a dealership agreement; and
- D-providing assistance to dealer outlets to reach these goals.

In fall 2004, in response to recommendation 8A, B, and D, the director of Retail Operations sent a letter to dealer outlets reminding them of their obligations and giving them the names of language schools that could evaluate the language skills of their bilingual employees. In our opinion, this measure is insufficient, because dealers have not shown any progress, nor do they have to report to the Corporation on their staff's bilingual capacity or language training.

In response to Recommendation 8C, official languages awareness sessions were launched in 2005 at postal outlets in the National Capital Region. The Corporation also included an official languages component in the awareness session that dealer outlet managers are required to attend as a way to notify them of their obligations and responsibilities and inform them about existing tools to help them improve customer service. In addition, to raise awareness among new bilingual dealer outlets of their obligations, outlet managers are asked to put their initials beside the official languages clause.

Canada Post claims that its third-party relationship with private-sector retailers prohibits it from getting involved in the administration of these outlets. It should be remembered that section 25 of the *Official Languages Act* stipulates that every federal institution has the duty to ensure that services provided or made available by another person or organization on its behalf comply with the requirements of the Act.

The Corporation plans to improve the performance of dealer outlets by using the monitoring mechanisms in place. However, the results of the dealer outlet spot-checks reveal a slight drop in services provided over the telephone and in person (63% and 62% respectively). Canada Post should take a more proactive approach with uncooperative retailers to comply with the obligation set out in section 25 of the *Official Languages Act*.

Status of Recommendation 8: recommendation partially implemented.

#### Canada Post's Response

Canada Post intends to ensure that the contractual obligations of its dealers are fulfilled and will take the steps necessary to achieve this. As indicated in our response to Recommendation 4, we will engage a third-party supplier to visit all 800 outlets designated bilingual to monitor compliance and to take corrective action where necessary. In instances where non-compliance is found, we will either provide the operators with written reminders or execute the default letter process, as appropriate. This default process enables Canada Post to terminate the agreements of dealerships that fail to comply with their contractual linguistic obligations.

#### Our Response

We welcome Canada Post's commitment to enforcing the language clause in the agreements with its dealers. However, beyond this coercive approach, Canada Post must also take measures to help dealers fulfill their language obligations. While we are aware that Canada Post does not want to get involved in the administration of dealer outlets, it is responsible under section 25 of the *Official Languages Act* for ensuring that equitable service is provided to members of official language minority communities. It is our opinion that Canada Post should show more creativity in working with its dealers.

#### **Recommendation 9**

Canada Post should undertake a formal consultation with linguistic minority associations on a regular basis as part of its process for determining the locations of bilingual postal outlets.

In 2004, we were informed that Canada Post was planning to establish a formal process for consulting with official language minority associations. We expected that implementation of this process would help initiate real dialogue between the Corporation and the associations.

Our telephone interviews with the representatives of these associations revealed that Canada Post has not implemented a formal consultation process. The association representatives all agreed that the e-mail they received from the Corporation was for information purposes and not a request for consultation. Furthermore, all the representatives interviewed said that the Corporation's regional coordinators had not contacted them for consultation.

Status of Recommendation 9: recommendation not implemented.

#### Canada Post's Response

We have contacted all provincial and territorial linguistic minority associations to provide them with information on the locations of the postal outlets designated bilingual, the 1-800 number where they can reach a Canada Post representative in their language of choice, and contact information for our national and regional official languages coordinators should they wish to discuss any official languages matters. We will continue to consult the associations on a regular basis.

#### Our Response

Canada Post is not proposing any measures to formalize the official language minority community consultation process. Our observations in the 2004 audit report were clear on this issue. Canada Post did not consult official language minority communities about bilingual outlets; it just provided them with a list of these outlets. Canada Post should have consulted with communities on the locations where they would prefer to receive postal services in their language. By providing a list of outlets designated bilingual, Canada Post did not give the communities an opportunity to provide their input.

The amendments brought about by the adoption of Bill S-3, which came into effect in November 2005, strengthen Part VII of the *Official Languages Act* and its scope. All federal institutions are now subject to new obligations and must henceforth take **positive measures** to enhance the vitality of English and French linguistic minority communities in Canada, support and assist their development, and foster the full recognition and use of both English and French in Canadian society.

It is our opinion that implementing a formal process for consulting official language minority communities regarding the location of postal outlets designated bilingual would be the kind of positive measure that Canada Post needs to take to fulfill its obligations under Part VII.

Please note that Recommendation 10 will not be commented on. This recommendation is not applicable anymore, since Canada Post is no longer part of the Service Canada network of access centres.

#### Managing the Level of Service

#### **Recommendation 11**

As part of its Sales Performance Review process, Canada Post should revise its criteria on language of service to reflect how assessments are done, and it should formalize its procedures both for taking corrective action and for monitoring its implementation.

The 2005 Sales Performance Review Checklist now refers the manager responsible for audits to the September 2004 issue of *InfoPost*, which details the audit criteria. In addition, the service standards for outlets designated bilingual and a copy of the procedure to follow in case of non-compliance with bilingual service requirements were published in *InfoMessage*.

Canada Post has formalized its monitoring mechanism and procedure for corrective action, if required. When a postal outlet is found to be non-compliant, the manager responsible must develop an action plan to correct the situation within a reasonable timeframe. The corrective measures must be documented in an action plan. The officer responsible at headquarters monitors the implementation; however, the manager is still responsible for the implementation of the action plan.

We encourage the Corporation to continue with this approach, while increasing the accountability of retail managers. After reviewing more than 10 action plans, we concluded that the process for monitoring the implementation of corrective measures should be strengthened when the deficiencies noted at the same outlets remain unaddressed from one audit to the next.

Status of Recommendation 11: recommendation implemented.

#### **Recommendation 12**

Canada Post should ensure that all bilingual outlets are assessed using the Mystery Shopper program over a reasonable period of time and that corrective actions are formally monitored.

In August 2005, the Corporation modified the Mystery Shopper program, which had been used for both bilingual and unilingual outlets, by creating a separate program specifically for bilingual outlets. By December 2005, the Corporation expects that 284 postal outlets designated bilingual will have been visited. It plans to conduct 264 visits at a rate of 22 outlets per month through 2006 and 2007. If everything goes according to schedule, all postal outlets designated bilingual (nearly 800) will be visited by 2008.

As for the Sales Performance Reviews, Canada Post has formalized the corrective measures that need to be implemented when deficiencies are noted by a mystery shopper. These measures need to be documented in an action plan. The officer responsible at headquarters monitors the implementation of action plans.

#### Status of Recommendation 12: recommendation implemented.

#### **Recommendation 13**

Canada Post should continue to formally monitor the service provided by bilingual postal outlets, ensure that action plans to correct deficiencies are formalized, and measure whether deficiencies noted during monitoring are fully corrected.

In response to our recommendation, the Corporation implemented a third monitoring mechanism by integrating official languages into the internal audits that it conducts at high-risk postal outlets.

In 2004, 113 postal outlets, 15 of which were designated bilingual, were audited. Internal audits provide for debriefing sessions with postal outlet managers. A report is drafted in which managers commit to develop an action plan. Internal audits also provide for monitoring of the implementation of this action plan.

Results of the monitoring mechanisms for the Sales Performance Reviews, the Mystery Shopper program, the Official Languages Directorate's internal audits, Canada Post's internal audit, as well as the audits of the Office of the Commissioner of Official Languages, are incorporated into the Corporation's audit data bank. Consolidating all these results allows the officer responsible at headquarters to compare the performance of postal outlets from one year to the next.

As indicated with regard to recommendations 11 and 12, Canada Post formalized its monitoring mechanism by requiring postal outlet managers to implement an action plan. After reviewing more than 10 action plans, however, we concluded that implementation of corrective measures should be monitored more closely when the deficiencies noted at the same postal outlets remain unaddressed from one audit to another.

#### Status of Recommendation 13: recommendation implemented.

#### **Recommendation 14**

Canada Post should make managers' performance in the area of language of service a component of the annual appraisal process.

Canada Post still claims that official languages are integrated into the annual managers' appraisal procedure under the service objectives section of the annual performance appraisal. Canada Post has taken measures to improve the quality of its performance appraisals, but none of these measures systematically addresses language of service.

Our 2004 response to Canada Post's action plan advised the Corporation that managers need to be held clearly accountable for language of service requirements, and that this may be accomplished through making language of communication with the public a separate and identifiable component of the annual appraisal process. We still maintain this position. We feel that it is essential that the official languages component should be evaluated separately and that it should have an impact on managers' performance pay. With this approach, we believe that managers would make implementation of their official languages action plan a priority. The lack of improvement in bilingual service over the telephone and in person leads us to conclude that managers are not taking their language responsibilities seriously enough.

Status of Recommendation 14: recommendation not implemented.

#### Canada Post's Response

Starting in 2006, we began to monitor the quality of procedural reviews for retail outlets. This monitoring process takes place monthly to ensure the information included in the review is reliable. The completion and the quality of procedural reviews have been added to the Regional General Managers' (RGM) scorecard (our performance measurement tool for incentive pay), hence holding the Territory Managers (reporting to RGMs) personally accountable for the integrity of the information.

#### Our Response

We are disappointed by Canada Post's lack of commitment to the follow-ups that it planned to make on this recommendation. Throughout the follow-up audit, Canada Post did not show that it had increased the accountability of managers who are responsible for official languages, or that an official languages component had been systematically integrated into managers' performance appraisals.

As we have been saying throughout this report, we believe it is essential that official languages be a separate component of managers' appraisals in all applicable cases. Furthermore, this component should have an impact on managers' perfomance pay in order to make it one of their priorities.

# CONCLUSION

We are disappointed with the Corporation's lack of progress in implementing our recommendations. Of the 13 recommendations made by the Commissioner in the 2004 audit report that are still valid, only 4 have been fully implemented and only 1 is in the process of being implemented. Of the 8 remaining recommendations, 4 have been only partially implemented and 4 have not been implemented at all.

The results of our on-site visits were also disappointing, because they show a lack of progress in providing services in both official languages at outlets designated bilingual. Half of all bilingual outlets did not make an active offer over the telephone, four out of five did not make an active offer in person, and one out of four did not provide satisfactory service in the minority language over the telephone and in person.

To improve its performance, Canada Post is relying on the monitoring mechanisms that it has implemented. It has improved its monitoring structure, but it must ensure that it ultimately gets results. Our follow-up showed that this is, unfortunately, not yet the case. This is why the implementation of the action plans arising from the monitoring mechanisms must be followed up more closely, and managers must be made more accountable. As long as the managers responsible are not explicitly assessed on their fulfillment of their language obligations, we believe that the equal treatment of both official languages will not be taken seriously enough.

With regard to dealer outlets, Canada Post must ensure that they respect the language clause of their contract. Poor performance by its dealers negatively affects the overall performance of Canada Post, which is still unsatisfactory.

In response to our follow-up, Canada Post agreed to take additional measures to follow up on some of the eight recommendations that were partially implemented or not implemented. It plans to add to its language of service policy a section on monitoring mechanisms, ask an independent firm to visit the 800 outlets designated bilingual, take the measures necessary to ensure that dealers' contractual obligations regarding official languages are fulfilled, and put imperative staffing on the agenda for the next negotiations with the union. However, we believe several of the proposed new measures are too vague and do not have any timeframe for implementation. As a result of the new obligations requiring that institutions take positive measures to promote the equality of English and French and enhance the vitality of official language minority communities, Canada Post should review the priority it gives to equality of English and French in its service delivery and the ways it contributes to the vitality of communities in light of the types of consultation it conducts and the lack of access to services in the minority language.

The Office of the Commissioner will continue to conduct spot-checks at postal outlets designated bilingual to ensure that Canada Post improves its performance in official languages. Results are all that really count.



#### Results of the Audit of Postal Outlets by Province/Territory, 2005

#### Table 1

Signage Indicating Bilingual Services, 2005

Province or Territory	Total Number in	Outlets Audited	Door	Decal	Outlets Audited		unter ogram	Outlets Audited		al or gram
	the Sample		#	%		#	%		#	%
Newfoundland and	Labrador		-							
Corporate Outlets	2	2	2	100	2	1	50	2	2	100
Dealer Outlets	1	1	1	100	1	1	100	1	1	100
Total	3	3	3	100	3	2	67	3	3	100
Prince Edward Islan	d									
Corporate Outlets	2	2	2	100	2	2	100	2	2	100
Dealer Outlets	2	2	0	0	2	0	0	2	0	0
Total	4	4	2	50	4	2	50	4	2	50
Nova Scotia										
Corporate Outlets	2	2	1	50	2	1	50	2	1	50
Dealer Outlets	3	3	3	100	3	3	100	3	3	100
Total	5	5	4	80	5	4	80	5	4	80
New Brunswick										
Corporate Outlets	3	3	2	67	3	3	100	3	3	100
Dealer Outlets	5	5	1	20	5	3	60	5	3	60
Total	8	8	3	38	8	6	75	8	6	75
Quebec			-							
Corporate Outlets	7	7	3	43	7	3	43	7	4	57
Dealer Outlets	2	2	0	0	2	1	50	2	1	50
Total	9	9	3	33	9	4	44	9	5	56
Ontario			-							
Corporate Outlets	5	5	5	100	5	2	40	5	5	100
Dealer Outlets	9	9	3	33	9	4	44	9	4	44
Total	14	14	8	57	14	6	43	14	9	64

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#### Table 1 (continued) Signage Indicating Bilingual Services, 2005

Province or Territory	Total Number in the Sample	Outlets Audited	Door	Decal	Outlets Audited		unter ogram	Outlets Audited		al or gram
	ine sumple		#	%		#	%		#	%
Manitoba										
Corporate Outlets	4	4	2	50	4	3	75	4	3	75
Dealer Outlets	3	3	0	0	3	1	33	3	1	33
Total	7	7	2	29	7	4	57	7	4	57
Saskatchewan										
Corporate Outlets	5	5	2	40	5	3	60	5	3	60
Dealer Outlets	2	2	1	50	2	1	50	2	1	50
Total	7	7	3	43	7	4	57	7	4	57
Alberta										
Corporate Outlets	2	2	0	0	2	0	0	2	0	0
Dealer Outlets	2	2	1	50	2	0	0	2	1	50
Total	4	4	1	25	4	0	0	4	1	25
British Columbia										
Corporate Outlets	1	1	1	100	1	1	100	1	1	100
Dealer Outlets	4	4	1	25	4	4	100	4	4	100
Total	5	5	2	40	5	5	100	5	5	100
Yukon Territory										
Corporate Outlets	0									
Dealer Outlets	1	1	1	100	1	1	100	1	1	100
Total	1	1	1	100	1	1	100	1	1	100
Corporate Outlets	33	33	20	61	33	19	58	33	24	73
Dealer Outlets	34	34	12	35	34	19	56	34	20	59
Total	67	67	32	48	67	38	57	67	44	66

### Table 2 Signage and Availability of Documentation in Both Official Languages, 2005

Province or Territory	Total Number in the Sample	Outlets Audited	Exterior	Signage	Outlets Audited	Interior	Signage	Outlets Audited	Temporary	Signage	Outlets Audited	Canada Post	Documentation	Outlets Audited	Federal	Government Documentation
			#	%		#	%		#	%		#	%		#	%
Newfoundland	d and La	brador														
Corporate Outlets	2	2	2	100	2	1	50	N/A			1	1	100	1	1	100
Dealer Outlets	1	1	1	100	1	1	100	N/A			N/A			N/A		
Total	3	3	3	100	3	2	67	N/A			1	1	100	1	1	100
Prince Edward	l Island															
Corporate Outlets	2	2	2	100	2	2	100	1	1	100	2	2	100	2	2	100
Dealer Outlets	2	2	2	100	2	1	50	1	0	0	2	2	100	2	2	100
Total	4	4	4	100	4	3	75	2	1	50	4	4	100	4	4	100
Nova Scotia																
Corporate Outlets	2	2	2	100	2	2	100	N/A			2	2	100	2	2	100
Dealer Outlets	3	3	3	100	3	3	100	N/A			3	3	100	3	2	67
Total	5	5	5	100	5	5	100	N/A			5	5	100	5	4	80

### Table 2 (continued) Signage and Availability of Documentation in Both Official Languages, 2005

Province or Territory	Total Number in the Sample	Outlets Audited	Exterior	Signage	Outlets Audited	Interior	Signage	Outlets Audited	Temporarv	Signage	Outlets Audited	Canada Post	Documentation	Outlets Audited	Federal	Government Documentation
			#	%		#	%		#	%		#	%		#	%
New Brunswic	k															
Corporate Outlets	3	3	3	100	3	3	100	2	2	100	3	3	100	3	3	100
Dealer Outlets	5	5	5	100	5	5	100	2	1	50	5	5	100	5	5	100
Total	8	8	8	100	8	8	100	4	3	75	8	8	100	8	8	100
Quebec												_				
Corporate Outlets	7	6	6	100	7	7	100	2	2	100	7	7	100	6	6	100
Dealer Outlets	2	1	1	100	2	2	100	N/A			2	2	100	2	2	100
Total	9	7	7	100	9	9	100	2	2	100	9	9	100	8	8	100
Ontario																
Corporate Outlets	5	5	5	100	5	5	100	2	2	100	5	5	100	5	4	80
Dealer Outlets	9	7	7	100	9	9	100	2	0	0	9	9	100	8	8	100
Total	14	12	12	100	14	14	100	4	2	50	14	14	100	13	12	92

Table 2 (continued) Signage and Availability of Documentation in Both Official Languages, 2005

Province or Territory	Total Number in the Sample	Outlets Audited	Exterior	Signage	Outlets Audited	Interior	Signage	Outlets Audited	Temporary	Signage	Outlets Audited	Canada Post	Documentation	Outlets Audited	Federal	Government Documentation
			#	%		#	%		#	%		#	%		#	%
Manitoba																
Corporate Outlets	4	4	4	100	4	4	100	N/A			4	4	100	4	3	75
Dealer Outlets	3	3	3	100	3	2	67	N/A			3	3	100	3	3	100
Total	7	7	7	100	7	6	86	N/A			7	7	100	7	6	86
Saskatchewar	า															
Corporate Outlets	5	5	4	80	5	4	80	N/A			5	5	100	5	5	100
Dealer Outlets	2	2	2	100	2	2	100	N/A			2	2	100	2	2	100
Total	7	7	6	86	7	6	86	N/A			7	7	100	7	7	100
Alberta											-	-			_	_
Corporate Outlets	2	2	2	100	2	2	100	1	0	0	2	2	100	1	0	0
Dealer Outlets	2	1	1	100	2	2	100	2	0	0	2	2	100	2	0	0
Total	4	3	3	100	4	4	100	3	0	0	4	4	0	3	0	0

## Table 2 (continued)Signage and Availability of Documentation in Both Official Languages, 2005

Province or Territory	Total Number in the Sample	Outlets Audited	Exterior	Signage	Outlets Audited	Interior	Signage	Outlets Audited	Temporary	Signage	Outlets Audited	Canada Post	Documentation	Outlets Audited	Federal	Government Documentation
			#	%		#	%		#	%		#	%		#	%
British Columb	oia															
Corporate Outlets	1	1	1	100	1	1	100	N/A			1	1	100	1	1	100
Dealer Outlets	4	4	4	100	4	4	100	N/A			4	4	100	3	3	100
Total	5	5	5	100	5	5	100	N/A			5	5	100	4	4	100
Yukon Territory	/															
Corporate Outlets	0															
Dealer Outlets	1	1	1	100	1	1	100	N/A			1	1	100	1	1	100
Total	1	1	1	100	1	1	100	N/A			1	1	100	1	1	100
Corporate Outlets	33	32	31	97	33	31	94	8	7	88	32	32	100	30	27	90
Dealer Outlets	34	30	30	100	34	32	94	7	1	14	33	33	100	31	28	90
Total	67	62 <sup>1</sup>	61	98	67	63	94	15 <sup>2</sup>	8	53	65³	65	100	614	55	90

<sup>1</sup> The total is less than 67 because one corporate outlet and four dealer outlets did not have any exterior signage that could be assessed by the auditor.

<sup>2</sup> The total is less than 67 because 25 corporate outlets and 27 dealer outlets did not have any temporary signage that could be assessed by the auditor.

<sup>3</sup> The total is less than 67 because one corporate outlet and one dealer outlet did not display any Canada Post documentation that could be assessed by the auditor.

<sup>4</sup> The total is less than 67 because three corporate outlets and three dealer outlets did not display any federal government documentation that could be assessed by the auditor.

#### Table 3

#### Active Offer of Bilingual Service Over the Telephone and at the Counter, 2005

		Over the	Phone		At	the Count	er
Province or Territory	Total Number in the	Outlets		Active Offer he Phone	Outlets		ctive Offer Counter
	Sample	Audited	#	%	Audited	#	%
Newfoundland and	Labrador					-	_
Corporate Outlets	2	1	1	100	2	1	50
Dealer Outlets	1	N/A			1	1	100
Total	3	1	1	100	3	2	67
Prince Edward Island	t						
Corporate Outlets	2	2	2	100	2	0	0
Dealer Outlets	2	1	0	0	2	0	0
Total	4	3	2	67	4	0	0
Nova Scotia							
Corporate Outlets	2	2	0	0	2	1	50
Dealer Outlets	3	2	1	50	3	1	33
Total	5	4	1	25	5	2	40
New Brunswick	-		-		-	-	-
Corporate Outlets	3	2	2	100	3	0	0
Dealer Outlets	5	2	2	100	5	0	0
Total	8	4	4	100	8	0	0
Quebec						-	
Corporate Outlets	7	4	0	0	7	1	14
Dealer Outlets	2	1	0	0	2	0	0
Total	9	5	0	0	9	1	11
Ontario							
Corporate Outlets	5	5	3	60	5	1	20
Dealer Outlets	9	4	0	0	9	0	0
Total	14	9	3	33	14	1	7

#### Table 3 (continued)

Active Offer of Bilingual Service Over the Telephone and at the Counter, 2005

		Over the	Phone		At	the Count	er
Province or Territory	Total Number in the	Outlets		Active Offer the Phone	Outlets		ctive Offer Counter
	Sample	Audited	#	%	Audited	#	%
Manitoba							
Corporate Outlets	4	1	1	100	4	3	75
Dealer Outlets	3	2	2	100	3	0	0
Total	7	3	3	100	7	3	43
Saskatchewan	•						
Corporate Outlets	5	5	2	40	5	3	60
Dealer Outlets	2	1	1	100	2	1	50
Total	7	6	3	50	7	4	57
Alberta	•					-	
Corporate Outlets	2	2	1	50	2	0	0
Dealer Outlets	2	1	0	0	2	0	0
Total	4	3	1	33	4	0	0
British Columbia				•			
Corporate Outlets	1	1	0	0	1	1	100
Dealer Outlets	4	4	2	50	4	0	0
Total	5	5	2	40	5	1	20
Yukon Territory				-		_	
Corporate Outlets	0						
Dealer Outlets	1	1	1	100	1	0	0
Total	1	1	1	100	1	0	0
						-	
Corporate Outlets	33	24	12	48	33	11	33
Dealer Outlets	34	19	9	47	34	3	9
Total	67	44 <sup>1</sup>	21	48	67	14	21

<sup>1</sup> The total number of outlets audited for active offer over the telephone is less than 67 because 23 outlets (8 corporate outlets and 15 dealer outlets) did not have a telephone number listed in the telephone directory that could be used by the auditor to assess active offer.

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#### Table 4

### Satisfactory Service in Minority Language Over the Telephone and at the Counter, 2005

		Over the Pho	ne		At the	Counte	r
Province or Territory	Total Number in	Outlets		actory vice	Outlets		actory vice
	the Sample	Audited	#	%	Audited	#	%
Newfoundland and Labro	ador				-	-	
Corporate Outlets	2	1	0	0	2	1	50
Dealer Outlets	1	N/A			1	1	100
Total	3	1	0	0	2	2	67
Prince Edward Island							
Corporate Outlets	2	2	1	50	2	1	50
Dealer Outlets	2	1	0	0	2	1	50
Total	4	3	1	33	4	2	50
Nova Scotia							
Corporate Outlets	2	2	1	50	2	1	50
Dealer Outlets	3	2	2	100	3	2	67
Total	5	4	3	75	5	3	60
New Brunswick							
Corporate Outlets	3	2	2	100	3	3	100
Dealer Outlets	5	2	2	100	5	4	80
Total	8	4	4	100	8	7	88
Quebec				-			
Corporate Outlets	7	4	4	100	7	7	100
Dealer Outlets	2	1	1	100	2	2	100
Total	9	5	5	100	9	9	100
Ontario							
Corporate Outlets	5	5	5	100	5	5	100
Dealer Outlets	9	4	1	25	9	5	56
Total	14	9	6	67	14	10	71

#### Table 4 (continued)

1

Satisfactory Service in Minority Language Over the Telephone and at the Counter, 2005

		Over the Pho	ne		At the	Counte	r
Province or Territory	Total Number in	Outlets		factory vice	Outlets		factory vice
	the Sample	Audited	#	%	Audited	#	%
Manitoba			2				-
Corporate Outlets	4	1	1	100	4	3	75
Dealer Outlets	3	2	2	100	3	1	33
Total	7	3	3	100	7	4	57
Saskatchewan		-			-		
Corporate Outlets	5	5	4	80	5	3	60
Dealer Outlets	2	1	1	100	2	1	50
Total	7	6	5	83	7	4	57
Alberta	•	•	•		•	-	
Corporate Outlets	2	2	2	100	2	2	100
Dealer Outlets	2	1	0	0	2	0	0
Total	4	3	2	67	4	2	50
British Columbia			-			-	
Corporate Outlets	1	1	0	0	1	1	100
Dealer Outlets	4	4	2	50	4	3	75
Total	5	5	2	40	5	4	80
Yukon							
Corporate Outlets	0						
Dealer Outlets	1	1	1	100	1	1	100
Total	1	1	1	100	1	1	100
Corporate Outlets	33	25	20	80	33	27	82
Dealer Outlets	34	19	12	63	34	21	62
Total	67	44 <sup>1</sup>	32	73	67	48	72

The total number of outlets audited for sastisfactory service offered over the telephone is less than 67 because 23 outlets (8 corporate outlets and 15 dealer outlets) did not have a telephone number listed in the telephone directory that could be used by the auditor to assess service in the minority language.



