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Commissioner of
Official Languages

Commissariat
aux langues
officielles

AUDIT

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

JANUARY 2010

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Table of Contents

Highlights	3
1. INTRODUCTION	5
1.1 Institution profile	5
1.2 Legislative framework.....	6
2. OBJECTIVES AND METHODOLOGY.....	8
3. FINDINGS AND RECOMMENDATIONS	9
3.1 Audit objective 1: Leadership	9
3.1.1 Program management framework	9
3.1.2 Visibility of the official languages program	12
3.1.3 Communications and contracts.....	13
3.1.4 Engaging federal institutions.....	16
3.2 Audit objective 2: Infrastructure and monitoring	17
3.2.1 Human resources management practices	17
3.2.2 Resolving official languages complaints	18
3.2.3 Monitoring mechanisms and observation results.....	19
3.2.4 Involvement of the official language minority community	21
3.2.5 Reporting to the authorities responsible for official languages	22
4. CONCLUSION	24
Appendix A : Recommendations to the Halifax International Airport Authority for each objective, the Airport Authority’s work plan and our comments	26
Appendix B: Audit objectives and criteria	32

Highlights

The Office of the Commissioner of Official Languages conducted an audit to examine the official languages program of the Halifax International Airport Authority between September 2007 and March 2008. The organization had the opportunity to respond to the preliminary report, and their work plan is included with our comments.

The audit dealt mainly with the management of the official languages program, including senior management's leadership as well as infrastructure and monitoring to support linguistic duality within the airport.

During the audit, we assessed the commitment of the Halifax International Airport Authority's Board of Directors and senior management to comply with their obligations under the *Official Languages Act*, and we verified whether the Airport Authority's organizational culture reflected linguistic duality. We also evaluated if the management framework and the mechanisms in place allow the Airport Authority to fulfil its obligations pertaining to service in both official languages to the travelling public. We examined how the Airport Authority communicated requirements related to official languages to various stakeholders at the airport. We also verified whether the institution had the structure to effectively monitor the availability and quality of bilingual services provided by specific contracted service providers.

We found that the Airport Authority has made progress since the audit began, and that, in some respects, it is heading in the right direction. It has developed an accountability framework and an action plan in relation to its official languages obligations. It has modified its structure to better manage its official languages program and has appointed an official languages champion. It also conducts some monitoring and it scored well on our observations on the presence of bilingual signage throughout the airport.

Nonetheless, our audit enabled us to identify a number of areas where the Airport Authority can do more to improve the overall management of its official languages program. Consequently, the Commissioner is issuing nine recommendations to the Halifax International Airport Authority to address the gaps mentioned in this report.

On the leadership front, the Commissioner is calling upon the Airport Authority to strengthen its accountability framework and action plan for official languages; develop a policy on service to the public in both official languages and a communications strategy to better disseminate official languages requirements to stakeholders throughout the airport; modify its contracts with specific service providers; and create a joint working group with other federal institutions at the airport to look at finding solutions to common challenges.

With respect to infrastructure and monitoring, the Commissioner is expecting the Airport Authority to review the language designation of its positions to ensure that it has a sufficient number of bilingual staff to meet its obligations as well as establish and implement formal mechanisms for the effective and efficient monitoring of compliance with

the *Official Languages Act*. In addition, the Airport Authority needs to put innovative measures in place to encourage contracted service providers to meet their official languages obligations. The Airport Authority must also extend its community consultations and outreach to official language minority communities to address concerns related to official languages compliance at the airport.

Generally speaking, the approach and the work plan presented by the Airport Authority respond only partially to the Commissioner's recommendations. We are encouraged by some of the measures identified in the Airport Authority's work plan with the exception of its response to recommendations where the Airport Authority has placed emphasis on possible federal funding. We understand the challenges faced by the institution; however, we think the Airport Authority needs to consider innovative and proactive ways to serve the public in both official languages at the Halifax Stanfield International Airport to make any significant progress.

We maintain that complete implementation of our nine recommendations is necessary to ensure the Airport Authority fully meets its obligation to deliver services in both official languages and the highest quality customer service possible for travellers passing through the Halifax Stanfield International Airport. By moving forward on these recommendations, the Airport Authority will demonstrate commitment to fulfil its official languages obligations and its leadership in terms of horizontal collaboration. We also encourage the Halifax International Airport Authority to promote linguistic duality in its dealings with all its clients.

We are confident that this audit will contribute to increasing the institution's commitment to official languages and ultimately to improving the services that it offers to the public in both official languages. We will conduct in due time a follow-up to this audit, to examine and report on the measures taken by the Airport Authority to implement our recommendations.

1. INTRODUCTION

1.1 Institution profile

The Halifax International Airport Authority operates the Halifax Stanfield International Airport. It is the region's principal full-service airport providing passengers and cargo clients with access to markets across the country, the United States and Europe. It is the only airport in Atlantic Canada to offer United States pre-clearance. The airport contributes \$1.15 billion to the provincial economy and is responsible for almost 12,000 direct and indirect jobs. The total employee population at the airport is approximately 5,400, of which fewer than 150 are Airport Authority employees. Total revenues for the Airport Authority in 2007 were \$56.6 million. The airport welcomes close to 3.4 million passengers annually, and is an internationally recognized leader in customer service, having received first place awards in the global Airport Service Quality program for the past five years.

The Airport Authority's Board of Directors consists of up to 14 directors: 10 appointed by nominating entities (federal, provincial and municipal governments, and the Halifax Chamber of Commerce) and a maximum of four appointed by the Board itself. The Board has established four committees: Governance, Audit, Capital Project and Executive. The Airport Authority's Executive Management Team is comprised of the President and Chief Executive Officer; Vice President, Finance, Chief Financial Officer and Chief Strategy Officer; Vice President, Infrastructure and Technology; Vice President, Corporate Communications, Retail and Community Development; Vice President, Operations; Vice President, Marketing and Business Development; and Vice President, Human Resources.

The Airport Authority's mission, updated in 2008, is to connect Nova Scotia to the world through flight. Its vision is to deliver the best airport experience in the world through great people.

The Airport Authority recognizes that it is in the service business and its ultimate goal is to make every moment passengers spend within their building fresh and engaging. Its management is determined to do even more to provide passengers with exceptional service and that is why a broad range of technological improvements have been introduced to make life easier for travellers and to help the airport run even more smoothly. The Airport Authority also commissioned a study to ask passengers, employees, tenants and local residents what new services they would like to see. That process demonstrates another aspect of the Airport Authority: its commitment to listen to and work with its partners—tenants, airlines, stakeholders, different levels of government and the neighbouring community.

The Airport Authority is a locally controlled, non-share capital corporation. As a private corporation in a competitive field, it must generate revenue in order to maintain the airport and ensure future growth. To maintain its status as the hub aviation complex for Atlantic Canada, the Airport Authority has embarked on a multi-year Airport Improvement Program. Several phases of this ambitious program have already been completed.

1.2 Legislative framework

Most of Canada's largest airports were owned and operated by Transport Canada before Parliament adopted the *Airport Transfer (Miscellaneous Matters) Act* (ATMMA) in 1992. Under the ATMMA, the federal government retains ownership of Canada's largest airports, but transfers the operations to not-for-profit, community-based airport authorities. The ATMMA provides for the continuing application of certain parts of the *Official Languages Act* to airports transferred by lease or by sale:

Application of Official Languages Act

4. (1) Where the Minister has leased an airport to a designated airport authority, on and after the transfer date, Parts IV, V, VI, VIII, IX and X of the *Official Languages Act* apply, with such modifications as the circumstances require, to the authority in relation to the airport as if

(a) the authority were a federal institution; and

(b) the airport were an office or facility of that institution, other than its head or central office.¹

The Airport Authority was incorporated on November 23, 1995. As a result of the National Airports Policy, the Airport Authority took over the management of the Halifax Stanfield International Airport on February 1, 2000. Transport Canada kept the role of landlord and regulator. The Airport Authority has a 60-year lease with Transport Canada, and a 20-year renewal option may be exercised.

Pursuant to section 4 of the ATMAA, the Airport Authority is therefore subject to certain parts of the *Official Languages Act* and its regulations as if it were a federal institution. One of the most important parts applicable to airport authorities is Part IV (Communications with and Services to the Public), which imposes a number of obligations relating to communications and the provision of services to the public in both official languages. In addition to imposing obligations with regard to members of the general public, Part IV also specifies particular obligations concerning communications with and services to the travelling public:

Travelling public

23. (1) For greater certainty, every federal institution that provides services or makes them available to the travelling public has the duty to ensure that any member of the travelling public can communicate with and obtain those services in

¹ ATMMA, section 4(1).

either official language from any office or facility of the institution in Canada or elsewhere where there is significant demand for those services in that language.

(2) Every federal institution has the duty to ensure that such services to the travelling public as may be prescribed by regulation of the Governor in Council that are provided or made available by another person or organization pursuant to a contract with the federal institution for the provision of those services at an office or facility referred to in subsection (1) are provided or made available, in both official languages, in the manner prescribed by regulation of the Governor in Council.²

For the purposes of section 23(1) of the Act, all airports handling at least one million passengers per year are considered to have significant demand, and must therefore communicate with and offer services to the travelling public in both official languages. Section 12 of the *Official Languages (Communications with and Services to the Public) Regulations* also defines which contracted services must be provided to the travelling public in both official languages:

Contract for Services to the Travelling Public

12. (1) For the purposes of subsection 23(2) of the Act, services to the travelling public are the following:

(a) restaurant, cafeteria, car rental, travel insurance, ground transportation dispatch, foreign exchange, duty free shop and hotel services;

(b) self-service equipment, including automated banking machines and vending machines, and the provision of instructions for the use of public telephones and electronic games; and

(c) passenger screening and boarding services, public announcements and the provision of other information to the public, and carrier services, including counter services for tickets and check-in but excluding carrier services in respect of buses provided at railway stations or ferry terminals.

(2) Where a service referred to in subsection (1) is provided by means of printed or pre-recorded material, such as signs, notices and menus, car rental contracts and travel insurance policies for the travelling public, the material shall be provided in both official languages.

(3) Where a service referred to in subsection (1) is provided by means other than those referred to in subsection (2), the service shall be offered to the travelling public by such means as will enable any member of that public to obtain those services in the official language of his or her choice.³

² *Official Languages Act*, Part IV, section 23.

³ *Official Languages (Communications with and Services to the Public) Regulations*, section 12.

Despite the scope of the obligations imposed on airport authorities by the various sections of the *Official Languages Act* and, in particular, the provisions of Part IV that remain applicable to the general public, it was agreed with the Airport Authority that we would focus our examination only on the management of the official languages program established for the provision of communications with and services to the travelling public. The Commissioner will continue to work with the Airport Authority and other airport authorities beyond the reach of this agreement to promote linguistic duality in their dealings with all clients.

2. OBJECTIVES AND METHODOLOGY

This first audit of an airport authority supports the Commissioner's efforts to ensure that institutions subject to the *Official Languages Act* are complying with its provisions. This audit focuses on the management of the official languages program, to determine whether the Airport Authority fully complies with its obligations pertaining to communications with and services to the travelling public.

To do so, we examined the leadership and commitment to implementing the *Official Languages Act* shown by the Airport Authority's administration. We also looked at the management framework and the mechanisms in place to ensure that services to the travelling public are in fact offered in both official languages at the airport. In addition, our audit assessed the extent to which the Airport Authority monitors its services, as well as services provided by airlines and contracted service providers (such as food services, car rental services, foreign exchange services and information counters), and works with other federal institutions located at the airport to promote bilingual services. The audit's objectives and criteria are presented in detail in Appendix B of this report.

The data collection and analysis phase of this audit was conducted primarily between June 2007 and March 2008. Our findings and recommendations result from the following activities:

- A review and analysis of documents provided by the Airport Authority;
- Some 25 interviews conducted in person or over the telephone with one of the Airport Authority's Board members, senior management executives, employees, contracted service providers, airline representatives and representatives from federal departments located at the airport; and
- In-person observations conducted at the airport on different occasions beginning in the summer of 2007 as part of the data collection process for the Office of the Commissioner's report card exercise. Additional observations were conducted in the fall of 2007 and during the summer and winter of 2008. For the purpose of this audit, the results of both observation exercises have been taken into consideration.

A debriefing session on the audit findings was held on April 9, 2009, with the Airport Authority's Executive Management representatives.

3. FINDINGS AND RECOMMENDATIONS

3.1 Audit objective 1: Leadership

To determine the extent to which the Airport Authority is committed to the effective implementation of the *Official Languages Act*, the audit examined the program management framework in place, the visibility of the program, communications with staff and contracted service providers, and the engagement of other federal institutions located at the airport.

3.1.1 Program management framework

For an official languages program to be successful, a solid program management framework is an essential starting point. This means that an institution should have the necessary corporate strategy, accountability framework, action plan and adequate resources in place to ensure the effective management and implementation of its official languages program.

3.1.1.1 Corporate strategy

The Airport Authority recently completed the development of its five-year strategic plan (2009–2013) and its 2009 business plan. The Airport Authority is committed to fully implementing an official languages program by the end of 2011. After examining the leadership shown by the Board and senior management in the context of official languages and whether or not official languages are reflected in the organizational culture of the Airport Authority, we can conclude that much of the program management infrastructure currently in place at the Airport Authority has been implemented as a direct result of the Office of the Commissioner's report card and audit processes. Indeed, these initiatives have raised awareness and brought several official languages issues to the attention of the Airport Authority's Board of Directors. Given this, and the recent appointment of an official languages champion, we are satisfied that, in general, the Board recognizes the importance of official languages issues.

Although the Airport Authority has appointed an official languages champion at the senior management level, we note that the Airport Authority has yet to make a formal announcement of the appointment. We encourage the Airport Authority's administrators to clearly define the role that the champion will play and proceed with a formal announcement as quickly as possible.

Within the institution, the perception of the importance of official languages varies widely from one department to another. The interviews we conducted showed that, although there is a positive trend toward acknowledging the importance of complying with the *Official Languages Act*, much more work must be done by the Airport Authority's leaders to fully integrate linguistic duality into the Airport Authority's corporate culture. The key to a successful corporate strategy regarding official languages will be to ensure that the commitment at the senior level that was mentioned earlier is clearly communicated to the rest of the organization and to the airport's contracted service providers.

While the Airport Authority has no formal corporate strategy in place with respect to official languages, our findings reveal that important elements of a strategy are currently being developed and implemented in the form of tools such as an accountability framework, internal policies, an action plan and monitoring mechanisms. These elements, in addition to the naming of an official languages champion, will serve as a strong foundation for an overall corporate strategy on official languages for the Airport Authority.

3.1.1.2 Accountability framework

An official languages accountability framework was implemented in 2007 in response to the Office of the Commissioner's report card and audit processes. Overall responsibility for the official languages program lies with the Airport Authority's President and Chief Executive Officer. The General Counsel assumes responsibility for official languages compliance matters. Our interviews indicated that the management of official languages issues is centralized in the legal department. The accountability framework also lists the names and responsibilities of other Airport Authority representatives with a role in official languages. The Vice President, Corporate Communications, Retail and Community Development, has the overall responsibility for communication with the travelling public, and for negotiating and administering contracts for retail services. The Vice President, Marketing and Business Development, has overall responsibility for negotiating and administering contracts for aeronautical services.

The implementation of an accountability framework has changed the way in which the official languages program is managed by the Airport Authority. Direction pertaining to managing the official languages file comes first and foremost from the General Counsel. The Airport Authority has set up a working group consisting of the General Counsel, a corporate paralegal, the Vice President, Marketing and Business Development, the Vice President, Corporate Communications, Retail and Community Development, and the Customer Relations Manager to coordinate the official languages program. They meet as needed, and some of the issues discussed at their meetings have been brought before the Executive Management Team. We noted, however, that no reports have been produced by this working group and that only the performance evaluations of the General Counsel and the paralegal assistant include commitments regarding the implementation of an official languages program at the Airport Authority. We would encourage the Airport Authority to consider adopting more formal means of communicating the group's recommendations and to include official languages commitments in the performance agreements of all its senior executives.

Our audit revealed that the Airport Authority's accountability framework could be strengthened in a number of ways. For example, the framework could better describe the mechanisms used by the Airport Authority to meet and communicate its obligations under the Act. Most people interviewed were unaware of the existence of the accountability framework, and we noted that awareness of the official languages issue varied from one individual to the other. The same can be said for contracted service providers, who were aware that some changes had occurred in the management of the official languages program, but did not know the details. Along with its other objectives, the management

framework should identify the individuals who have specific official languages responsibilities (employees of the Airport Authority, other federal institutions, contracted service providers). It would be beneficial to disseminate this information widely.

The audit also showed that the various departments of the Airport Authority are individually responsible for many of their own official languages operations, including translation, determining the linguistic requirements of positions, handling complaints and monitoring the agreements with different contracted service providers. A strengthened accountability framework could therefore be used to develop a more concerted and proactive approach within the Airport Authority with respect to management of the official languages program.

In our opinion, implementation of the existing accountability framework should allow the Airport Authority to clearly define its roles and responsibilities with respect to official languages and give the program its due importance within the organization, as a first step. It is crucial that this framework be re-evaluated in the medium term in order to address some of the gaps identified above.

Recommendation 1

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

3.1.1.3 Action plan

The Airport Authority developed an action plan in late 2007 in response to the report card process and has indicated that it is committed to developing a more comprehensive action plan in the future. While this is an important first measure, we believe that the action plan should be revised promptly to include clear objectives, planned activities specifying timelines and areas of responsibility with performance indicators, as well as expected outcomes and monitoring mechanisms to ensure compliance and improve the availability of services in both official languages. The action plan should also be approved by the Executive Management Team and be communicated to all employees and specific third parties. Focusing on these elements would address important gaps in the action plan that were identified during our audit.

Recommendation 2

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

3.1.2 Visibility of the official languages program

Ensuring that the official languages program is given adequate visibility within the organization and with the travelling public is an important component of a successful program. The audit examined the extent to which the organization had taken measures to increase the visibility and the integration of official languages in the Airport Authority's corporate documents and its corporate culture.

Our findings reveal that, in general, the official languages program of the Airport Authority does not have the level of visibility that it should, and we found a number of examples illustrating this point:

- The official name of the corporation (Halifax International Airport Authority) and the recently updated airport logo are in English only.
- Our interviews indicated that many employees, Board members and some contracted service providers perceived the airport as an English entity and not as a bilingual one.
- The public documents that we examined had no mention of official languages and, although some parts of the Airport Authority's Web site are in French, it does not always provide the information that is available in English.
- From our interviews, we learned that the general perception was that the Airport Authority was indeed concerned with official languages, but that the preferred approach was reactive, with corrective steps being taken only once complaints were received.
- In our examination of the Executive Management Team's records of decisions, we noted that the issue of official languages was not discussed prior to the Airport Authority receiving our notice of intent to conduct the audit.
- The Airport Authority does not have an internal official languages policy or guidelines on communications with and services to the travelling public. Our interviews indicated that, from the Airport Authority's point of view, a clause in the contracts of service providers and the distribution of an annual reminder were considered adequate to ensure awareness.

We were pleased to note that the President's Report, which is distributed to the Board of Directors, has included a recurring item on official languages since September 2007. According to the Airport Authority, this report assists in raising awareness of official

languages obligations among members of the Board of Directors. That being said, further efforts will be required by the Airport Authority to address some of the visibility gaps mentioned previously.

It is too early to assess the impact of the changes made to the official languages program in the fall of 2007 on the Airport Authority's organizational culture. While we are aware of the Airport Authority's decision to pay closer attention to official languages issues, we believe that it must do more in concrete, tangible ways to demonstrate its commitment to linguistic duality and to raising the visibility of the program among the airport's key occupants to ensure that they take full responsibility for the bilingual services they are required to provide to the travelling public. To that end, we believe that an internal policy or guidelines for specific contracted service providers on service to the public in both official languages would be an important step in contributing to a real change in the organizational culture within the airport.

Recommendation 3

The Commissioner recommends that the Halifax International Airport Authority:

a) take appropriate measures to demonstrate in concrete, tangible ways its commitment to promoting linguistic duality and to raising the visibility of the official languages program among the airport's key occupants to ensure that they take full responsibility for the services they are required to provide to the travelling public in both official languages;

b) develop an internal policy that clearly defines the Airport Authority's obligations and expectations with respect to bilingual services provided to the travelling public by its employees and by specific contracted service providers at the Halifax Stanfield International Airport.

3.1.3 Communications and contracts

Managing an effective official languages program also means ensuring solid and clear communications with those who are responsible for its implementation. In the case of the Airport Authority, this means effectively communicating its official languages policies, plans and procedures to its managers, employees and contracted service providers to ensure that they know and understand their responsibilities under the *Official Languages Act*. It also means ensuring that contracts with specific third-party service providers clearly indicate the Airport Authority's official languages obligations.

3.1.3.1 Communications

The audit's overall findings, in this category, are that official languages obligations and responsibilities are not systematically and effectively communicated to the appropriate audiences.

For example, our interviews determined that a contract clause and a yearly reminder constitute the primary way in which the Airport Authority communicates its official languages responsibilities to its contracted service providers. As mentioned earlier, we also found that, at the time of the interviews, in general, people were not aware of the changes made to the official languages program or of the Airport Authority's accountability framework and action plan.

Our interviews also showed that some contracted service providers as well as their employees were not sufficiently aware of their obligations to make an active offer of bilingual services and provide services in both official languages. Indeed, many of those interviewed said they had not been informed about their obligations, although a number of them recalled a clause in their contract. Most store managers interviewed indicated that they had not received any training on official languages and that they obtain their information through infrequent personal contact from their head office or through e-mails. Only some recalled a yearly reminder or conversations with various Airport Authority employees on the subject.

Furthermore, during the interviews, some managers were surprised to learn that they were required to make an active offer of bilingual services and provide services in both official languages. In the minds of some, their obligation is limited to making efforts to find someone to translate if the person requests the service in French and cannot communicate in English. Only one individual acknowledged the obligation to make the verbal active offer in both official languages.

Many contracted service providers also indicated that, if a person really wanted service in French, employees would seek the help of colleagues or, if it were open, the tourism booth (in person or by telephone) or, in some cases, a telephone service available from their head office. Very few requests of this nature have been made, however, and when they occur, they tend to involve various other languages such as German or Chinese, and not always French.

The Airport Authority also indicated that it uses the Nova Scotia Department of Tourism Information Centre to help provide services in both official languages. There is a toll-free language translation service to which the contracted service providers can subscribe. In addition, the Security Department provides service in both official languages from 7:30 a.m. to 5:00 p.m., Monday to Friday. Outside of these hours, security officers have access to the toll-free language translation service, and the Nova Scotia Tourism Information Centre provides bilingual services until 9 p.m., seven days a week.

In terms of communications with members of the travelling public, the Airport Authority's Corporate Communications, Retail and Community Development Department regularly publishes ads in Nova Scotia and New Brunswick French-language newspapers to advise members of the travelling public of issues that may affect their travel plans.

The main challenge identified in all the interviews is the difficulty in finding and retaining bilingual personnel in Nova Scotia, especially at the airport, where there is no public transportation and low wages are common. This problem has been acknowledged by the

Airport Authority, but no measures have been put in place to address it, as it is seen more as a concern for contracted service providers than for the Airport Authority itself.

Subsequent to our audit interviews, the Airport Authority established the Halifax Stanfield Merchants Association to serve as an informal venue for airport merchants to discuss a wide variety of issues, including complaints from the travelling public. The topic of official languages is a recurring agenda item and, among other things, the Association provides a forum for official languages discussions and reminds merchants of their official languages obligations.

Given the need to raise awareness among the Airport Authority's employees and contracted service providers with respect to official languages obligations, we urge the Airport Authority to take concrete steps to promote and enhance awareness throughout the airport on the responsibilities and obligations linked to the active offer and delivery of bilingual services stipulated in the Act. This endeavour could take the form of a communications strategy and include an awareness campaign specifically targeting its contracted service providers. The goals of this campaign would be to clearly explain the official languages obligations in relation with service to the public and equip specific contracted service providers with the necessary tools to help them fulfill their language obligations. The Airport Authority could use official languages information tools developed by other institutions dealing with contracted service providers as a model.

Recommendation 4

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

3.1.3.2 Contracts

The Airport Authority has informed us that a language clause is included in all contracts, but we have been able to verify only a small proportion of these contract clauses. We were provided with three generic clauses used in contracts and we examined specific clauses in the contracts of eight service providers.⁴

The clauses we analyzed varied from being very detailed to generic statements of required compliance with all applicable rules, regulations and by-laws, without specifically

⁴ Continental Air, Commissionaires Nova Scotia, National Rent-A Car, Down East Hospitality, Double Decker, AirRienta, Travelex and Vendco Services.

referring to official languages.⁵ We also noted that the Airport Authority no longer incorporates a liquidated damages clause into its retail contracts. Due to commercial sensitivities, the Airport Authority has never fined a contracted service provider for official languages non-compliance.

Since September 2007, the official languages clause inserted into contracts now reads as follows:

“The Lessee is a federal institution for the limited purposes contemplated in the *Official Languages Act*, and this Agreement is a contract for services to the travelling public as contemplated in the *Official Languages (Communications with and Services to the Public) Regulations*. As such, the Lessee shall ensure that all services provided under this Agreement are made available to the travelling public in both English and French.”

We recognize the importance of these clauses. However, in our view, they can be improved by consistently including specific provisions with respect to incentives for compliance or consequences of non-compliance.

We believe that, in all new contracts, the Airport Authority should continue to include a language clause that is reflective of the obligations of contracted service providers under the Act and its Regulations, including appropriate provisions to encourage compliance or address cases of non-compliance.

Recommendation 5

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

3.1.4 Engaging federal institutions

The final leadership component that the audit examined was the extent to which the Airport Authority engages federal institutions located at the airport in providing bilingual services. During our interviews, the Airport Authority clearly explained that it does not get involved in how federal institutions deliver their services to the travelling public or in any other official languages matters.

⁵ The Air Carrier, or any agent(s) of the Air Carrier, shall in all respects abide and comply with all applicable lawful rules, regulations, and by-laws of the federal, provincial or municipal governments or of any other governing body whatsoever. The Air Carrier, or any agent(s) of the Air Carrier, shall abide by and comply with all directives issued from time to time by the Airport Authority concerning the operation of the airport.

In our view, this type of engagement would have a significant positive impact on the way the Airport Authority fulfills its linguistic obligations and would enable the Halifax Stanfield International Airport to provide high quality services to the travelling public in both official languages. This horizontal dialogue would also encourage the sharing of best practices and enable institutions to jointly address common concerns.

Recommendation 6

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

3.2 Audit objective 2: Infrastructure and monitoring

The second key objective of the audit was to determine if the Airport Authority has the appropriate structures and resources in place to ensure the effective management of its official languages program, its coordinating role, and overall compliance with the *Official Languages Act*. The criteria pertaining to this objective were the following: effective human resources practices, a mechanism to deal with complaints, appropriate monitoring, the involvement of the official language minority community and reporting on official languages matters to the responsible federal authority.

3.2.1 Human resources management practices

When examining the overall management of an official languages program, it is important to look at the human resources management practices of the institution to see whether its recruitment, staffing, training and performance agreements reflect and integrate the obligation to ensure compliance with the *Official Languages Act*.

During our interviews, Airport Authority officials indicated that, since only very few services are provided directly to the travelling public by its employees, they feel there is no apparent need for bilingual positions. At the time of the audit, there were no positions at the Airport Authority designated bilingual. Moreover, the only staff member who provides service to the travelling public is unable to do so in French. In our view, having an adequate number of bilingual employees would be a concrete way for the Airport Authority to demonstrate its commitment to Canada's linguistic duality and fulfill its language obligations under the Act.

Although the Airport Authority has not designated any position as bilingual, the Operations Department had staffed a Customer Relations Assistant position with a bilingual person in June 2009. In addition, the Airport Authority has identified the Human Resources Administrative Assistant (front desk receptionist) and Customer Relations Manager positions as potential opportunities to hire bilingual replacement staff when the

incumbents retire. As well, the Vice President, Human Resources, in consultation with the other members of the Executive Management Team, designates bilingual positions. We encourage these officials to examine this issue and take into consideration the need not only to have bilingual staff available to offer services, but also to adequately coordinate and monitor the implementation of the official languages program, and, in the context of the Airport Authority's internal complaint resolution process, to deal with potential complaints from the travelling public. Moreover, the Airport Authority should consider allocating the necessary financial resources to language training so that the incumbents in these positions can meet the language requirements that would enable them to fulfill their official languages obligations.

Finally, our interviews determined that there is no official languages component in employee performance assessments, as performance evaluations only apply to the employees excluded from the union. However, one person reported having requested that a reference to official languages be inserted as one of that individual's performance objectives for the past two years. In our view, making this a more widespread practice would help maintain an awareness of official languages responsibilities on the part of Airport Authority employees, in addition to increasing accountability among employees and management.

Recommendation 7

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

3.2.2 Resolving official languages complaints

Resolving official languages complaints quickly and effectively is an important aspect of a successful official languages program. The audit examined the extent to which proper mechanisms are in place to deal with complaints and prevent similar issues from occurring in the future.

Although there have been few official languages complaints concerning services to the travelling public in particular, the Airport Authority has put in place a mechanism to manage such complaints. At the end of 2007, a flow chart was developed to document the status of the steps involved in addressing each complaint. Subsequently, the Executive Management Team, earlier briefed on the complaints resolution process, gave the chart its approval. As mentioned earlier in this report, the Airport Authority has also established an informal venue for airport merchants to discuss a wide variety of issues, including complaints from the travelling public.

Official languages complaints are handled through the legal department of the Airport Authority, with the assistance of the managers responsible for the various areas of activity. Periodic follow-ups are conducted until the matter is resolved. This process usually remains within the affected department, but the Executive Management Team is informed if the issue cannot be resolved at the departmental level.

In our view, it is important that the corrective measures taken in response to complaints be shared throughout the organization and with contracted service providers in an effort to prevent similar issues from recurring in the future and to promote good practices. The Airport Authority could also take steps to share such information with other federal institutions at the airport through a joint working group on official languages (see Recommendation 6).

3.2.3 Monitoring mechanisms and observation results

Effective and efficient monitoring is essential to ensuring full compliance with the *Official Languages Act*, and acts as a means to address compliance issues before they become complaints. During the course of the audit, we examined the monitoring mechanisms used by the Airport Authority, and conducted our own observations at the airport to determine the current level of compliance with the Act.

3.2.3.1 Monitoring mechanisms

As indicated earlier in this audit report, the Airport Authority is of the view that it offers few services directly to the travelling public. Indeed, the most important services intended for the travelling public are provided by contracted third parties, many of whom have the obligation to provide their services in both official languages.

Our interviews determined that the Airport Authority does not have a formal mechanism for monitoring and evaluating how those responsible for contracts are fulfilling their responsibilities under the *Official Languages Act*. Moreover, contracted service providers required to provide services in both official languages are not evaluated in terms of their bilingual capacity or the quality of bilingual services offered by their establishments. Furthermore, the Airport Authority is well aware of the weaknesses in the language capacity of its contracted service providers.

Despite the lack of a formal mechanism, the Airport Authority has taken a number of informal steps to monitor its overall operations, such as the contract agreement with specific service providers, reviewing feedback received from members of the travelling public, periodic reminders and spot checks conducted by employees reporting to the Customer Relations Manager, to verify the availability and quality of services to the travelling public in the official language of the linguistic minority.

The Airport Authority used to incorporate a liquidated damages clause into its retail contracts, which include, among other things, a line item for official languages. Due to

commercial sensitivities, the Airport Authority has never fined a contracted service provider for official languages non-compliance under the Act.

Instead, annual reminders of their official languages obligations are sent to contracted service providers. In the case of specific incidents involving official languages, the Airport Authority manager who oversees a particular contract will meet the contracted service provider's manager to provide a reminder of the requirement to comply with their official languages obligations and about existing support services. In accordance with its procedure, the Airport Authority reviews each complaint on a case-by-case basis and determines the best approach to assist in bringing the complaints to a satisfactory resolution.

While informal monitoring can sometimes yield results, in our view, it is not sufficient. It will be important that the Airport Authority implement more formal measures to ensure effective, efficient and continuous compliance both from its own organization and from the contracted service providers in the airport that are required to offer their services in both official languages. For example, the Airport Authority should consider developing innovative measures to this end, such as observations conducted by "mystery clients," and, based on the results obtained, recognition initiatives or perhaps financial compensation. It will be equally important that the Airport Authority clearly communicate the consequences of non-compliance to these providers. It should also seek to include official languages in its internal audit plan.

From the perspective of establishing a more holistic approach to official languages compliance at the airport, we also encourage the Airport Authority to engage in more extensive coordination with the federal institutions located in the airport (see Recommendation 6).

Recommendation 8

The Commissioner recommends that the Halifax International Airport Authority:

a) implement formal mechanisms for the effective and efficient monitoring of compliance with the *Official Languages Act* from all contracted service providers at the Halifax Stanfield International Airport that are required to provide their services in both official languages;

b) develop and implement innovative measures to encourage contracted service providers to meet their official languages obligations.

3.2.3.2 Observation results

As part of the audit process, the Airport Authority provided us with a list of contracted service providers at the airport with direct responsibility for the provision of services to the travelling public. We then conducted in-person observations of these establishments to

determine the extent to which the *Official Languages Act* was being respected at the airport. Our findings are outlined below.

- **Signage:** Permanent signs throughout the airport are generally bilingual. Some signs indicating construction work and some temporary signs (that are the Airport Authority's responsibility) were not bilingual at the time of our observations.
- **Active offer:** Some of the contracted service providers' stores had a pictogram indicating that service was offered in both official languages. A verbal active offer of bilingual services was seldom made.
- **Availability of services in French:** Among the contracted service providers that are required to provide their services to the travelling public in both official languages, very few were able to do so or offered to get someone to help. However, we obtained satisfactory service from the tourism information office every time. This is consistent with the findings of the report card. Many announcements targeting specific individuals, for example, pertaining to flight changes and boarding announcements, were in English only. The airport has an automated announcement system for some prerecorded public interest announcements. The Airport Authority is looking at upgrading this system to convert flight data from various sources into bilingual announcements.

We believe that the Airport Authority's performance in the area of active offer and delivery of services in both official languages would significantly improve by adopting a proactive approach to monitoring the quality and availability of the services delivered to the travelling public by the contracted service providers. The Airport Authority would clearly benefit from more effective, formal monitoring mechanisms (see Recommendation 8).

Earlier in this report, we mentioned the recent appointment of an official languages champion for the Airport Authority. We believe that the champion could play a major role in raising awareness about the obligations to make an active offer of bilingual services and provide announcements in both official languages throughout the airport.

3.2.4 Involvement of the official language minority community

During the course of this audit, we also examined whether the Airport Authority engaged official language minority community representatives in discussing improvements that could be made to enhance the bilingual image of the airport either on its own or in collaboration with federal institutions. We noted that the Airport Authority's Marketing and Business Development Department is investigating the use of local French-language radio stations and newspapers to conduct promotional contests. In our view, this type of partnership is an important part of the process in maintaining and improving the provision of quality bilingual services at the airport.

From our interviews, we learned that discussions with the local Francophone community had not taken place, and the input of this community had not been specifically sought. However, we have learned that, since our audit, senior officials at the Airport Authority

have met with the Director General of the Fédération acadienne de la Nouvelle-Écosse to discuss the Airport Authority's official languages program.

The Airport Authority has a Community Outreach Program as well as a community consultative committee with the objective of providing ongoing dialogue and information on various airport-related matters, including planning, operations and municipal concerns. The committee meets at least twice a year and includes consumers and individuals representing a wide variety of industries, the travelling public and provincial and municipal governments. In 2008, the Airport Authority actively recruited a well-respected member of the local Francophone community to join this committee. Given these positive initiatives, we feel that the Airport Authority should pursue its efforts to seize every opportunity to extend its consultations and involvement with the local Francophone community.

From our point of view, this kind of dialogue will enable the Airport Authority to gain a better understanding of the needs of this Francophone community, and to tap into the knowledge and resources that the community may have to offer in areas such as the recruitment of bilingual personnel. The Airport Authority could play a leadership role in working with the official language minority community to help fill some of the gaps noted in official languages compliance on the part of its organization as well as specific contracted service providers at the airport.

We would also encourage the Airport Authority to include representatives from other federal institutions located within the airport (see Recommendation 6) in this dialogue with the community in order to address areas of concern to all parties.

Recommendation 9

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

3.2.5 Reporting to the authorities responsible for official languages

The final criterion that was examined as part of this audit was whether the Airport Authority actively reports to the federal authorities in charge of official languages files. This kind of reporting is important to enable federal officials to monitor the progress of federal institutions subject to the *Official Languages Act* and identify any particular areas of concern.

The central agency that monitors the implementation of Part IV of the *Official Languages Act* and, in particular, its implementation by airport authorities is the Treasury Board Secretariat. The Treasury Board is required by law to submit an annual report on Parts IV,

V and VI of the Act to Parliament. Each year, it sends a request to federal institutions, including airport authorities, for the relevant information needed to complete this report.

We noted during the audit that, despite receiving such a request, the Airport Authority did not report to the Treasury Board between 2001 and 2007. However, in 2008 and 2009, the Airport Authority provided the Treasury Board with the tables related to the Official Languages Information System II (OLIS II). We encourage them to continue to provide the necessary data and to complete the requested report.

4. CONCLUSION

During the audit, we assessed the commitment of the Halifax International Airport Authority's Board of Directors and senior management to complying with their obligations under the *Official Languages Act*, and we verified whether the Airport Authority's organizational culture reflected linguistic duality. We also evaluated whether the management framework and the mechanisms in place allow the Airport Authority to fulfill its obligations pertaining to service to the travelling public. We examined how the Airport Authority communicated information on official languages to various stakeholders at the airport. We also verified whether the institution had the structure to effectively monitor the availability and quality of bilingual services given by specific contracted service providers.

Our findings lead us to conclude that the Airport Authority has made progress since the audit began, and that, in some respects, it is heading in the right direction. It has developed an accountability framework and an action plan in response to the report card process and this audit. It has modified its structure with the objective of better managing its official languages program. It also conducts some monitoring and it scored well in our observations on the presence of bilingual signage throughout the airport.

Nonetheless, our audit enabled us to identify a number of areas where the Airport Authority can do more to improve the overall management of its official languages program. In total, the Commissioner is issuing nine recommendations to the Airport Authority to address the gaps mentioned in this report.

On the leadership front (objective 1), the Commissioner is calling upon the Airport Authority to take the following steps:

- Strengthen its accountability framework and action plan for official languages;
- Develop an official languages policy on service to the public and a communications strategy to better disseminate information on official languages to stakeholders throughout the airport;
- Modify its contracts with specific service providers to include either incentives for official languages compliance or consequences of non-compliance; and
- Create a joint working group with other federal institutions at the airport to address official languages issues.

By implementing these recommendations, the Airport Authority will be recognizing the importance of ensuring that all of its employees and specific contracted service providers are well aware of their official languages obligations and the consequences of non-compliance. Moreover, by implementing our recommendations, the Airport Authority will ensure that its corporate documents related to official languages and senior-level commitment become tools to bring forth and sustain real organizational and cultural change. The Airport Authority would also be recognizing the need for horizontal collaboration within the airport in the interest of offering the highest quality customer service possible for travellers passing through the Halifax Stanfield International Airport.

With respect to infrastructure and monitoring (objective 2), the Commissioner is calling upon the Airport Authority to take the following action:

- Review the language designation of its positions to ensure that it has a sufficient number of bilingual staff to meet its obligations;
- Establish and implement formal mechanisms for the effective and efficient monitoring of compliance with the *Official Languages Act* from all contracted service providers at the Halifax Stanfield International Airport that are required to provide their services in both official languages;
- Put innovative measures in place to encourage contracted service providers to meet their official languages obligations;
- Extend its community consultations and outreach specifically to the official language minority community in order to share concerns and discuss potential solutions with respect to official languages compliance at the airport.

By moving forward on these recommendations, the Airport Authority would be demonstrating its commitment to ensuring that the proper infrastructure and monitoring mechanisms are in place within its organization and within the airport, and that the concerns of the official language minority community are taken into account with the objective of improving customer service to better meet client needs. We believe that implementing these recommendations would be an important step in addressing some of the gaps identified by our observations at the airport, and would lead to better overall compliance results.

Finally, we encourage the Airport Authority to promote linguistic duality in its dealings with all its clients. We believe that this audit will contribute to increasing the institution's commitment to official languages and ultimately to improving the services that it offers to the public, in both official languages.

Appendix A: Recommendations to the Halifax International Airport Authority for each objective, the Airport Authority's work plan and our comments

Generally speaking, the approach and the work plan presented by the Halifax International Airport Authority respond only partially to the Commissioner's recommendations.

We are encouraged by some of the measures identified in the Airport Authority's work plan. However, in responding to our recommendations, the Airport Authority has placed emphasis on possible federal funding as opposed to focusing on service in both official languages and developing new ways of working with service providers. We understand the challenges faced by the institution; nevertheless, to fully demonstrate its commitment to serve the public in both official languages at the Halifax Stanfield International Airport and to make any significant progress, the Airport Authority needs to consider innovative and proactive ways to meet its official languages obligations in relation to service to the public.

We maintain that complete implementation of our nine recommendations is necessary if the Airport Authority is to fully meet its obligation to offer services in both official languages and provide the highest quality customer service possible to travellers passing through the Halifax Stanfield International Airport.

We are confident that this audit will contribute to increasing the institution's commitment to official languages and ultimately to improving the services that it offers to the public, in both official languages.

Recommendation 1

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

The Airport Authority's work plan

- Revise accountability framework to refer to standard contract language and annual reminders (Q4 2009)
- Make contact with contracted service providers, specifically those persons responsible for official languages (Q2 2010)
- Plan to host a "lunch and learn" (Q2 2010)
- Review accountability framework annually (Q4 of each year)

Our comments

The Airport Authority has indicated it will revise its accountability framework to refer to standard contract language and annual reminders in the fourth quarter of 2009. This is a good start, as is reviewing the accountability framework annually. Unfortunately, these actions are incomplete in regard to the recommendation of strengthening the framework to include the mechanisms used to meet official languages obligations, broadly communicating the information and encouraging a more concerted and proactive approach to the official languages program.

Recommendation 2

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

The Airport Authority's work plan

- Continue to update the action plan as required (ongoing)
- Executive Management Team to annually review the action plan (Q4 of each year)
- Give employees a short annual presentation on the Airport Authority's official languages obligations at an internal briefing (Q2 of each year)
- Corporate Communication, Retail and Community Development to develop a communications strategy in consultation with General Counsel (Q4 2010)

Our comments

The Airport Authority has indicated it is preparing a communications strategy and that the action plan approved by the Executive Management Team on October 8, 2008, will be reviewed annually. We are encouraged by these activities and we are expecting changes that will lead to an action-oriented plan with clear indications of the outcomes of proposed activities.

Recommendation 3

The Commissioner recommends that the Halifax International Airport Authority:

- a) take appropriate measures to demonstrate in concrete, tangible ways its commitment to promoting linguistic duality and to raising the visibility of the official languages program among the airport's key occupants to ensure that they take full responsibility for the services they are required to provide to the travelling public in both official languages;

The Airport Authority's work plan

- Annually review and update the Web site to ensure all information is bilingual (Q2 of each year)

- Corporate Paralegal is currently working on hosting a “lunch and learn” with some of the federal institutions and air carriers located at the airport (Q2 2010)
- Continue to address official languages in the Airport Authority’s annual business and strategic planning cycles (ongoing)
- Address official languages in future annual reports (Q2 of each year)
- Annually update Executive Management Team and Board on status of official languages program (Q4 of each year)
- Place suitable official languages posters in certain areas of the airport to encourage employees to speak their mother tongue (ongoing)

b) develop an internal policy that clearly defines the Airport Authority’s obligations and expectations with respect to bilingual services provided to the travelling public by its employees and by specific contracted service providers at the Halifax Stanfield International Airport.

The Airport Authority’s work plan

No plan to address this part of the recommendation.

Our comments

The Airport Authority indicates a number of activities to address the first part of the recommendation, but there is no indication it will develop an internal policy to address the second part of the recommendation. Given the challenges the Airport Authority is facing in relation to the provision of bilingual services to the travelling public by its employees and by specific contracted service providers, we strongly recommend the development of an internal policy to support its commitment to promoting linguistic duality.

Recommendation 4

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

The Airport Authority’s work plan

- Corporate Communications, Retail and Community Development to develop an official languages communications strategy in consultation with General Counsel (Q4 2010)

Our comments

The Airport Authority’s intention to develop an official languages communications strategy in the fourth quarter of 2010 is also given as a response to Recommendation 2. We strongly encourage the Airport Authority to ensure the strategy includes a highly visible awareness campaign accompanied by the tools

needed to help service providers make an active offer and deliver service in both official languages.

Recommendation 5

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

The Airport Authority's work plan

- Ensure future contracts continue to address official languages obligations (ongoing)
- Subject to federal funding, explore possibility of incentives (Q4 2010)

Our comments

The Airport Authority indicates that it will continue to address official languages obligations in future contracts and will explore the possibility of incentives. It is to be noted that the Ottawa International Airport Authority fines concessionaires when there is a reported infraction of the *Official Languages Act*. The issue is one of commitment to ensure compliance with the Act and commitment to linguistic duality. As the Halifax International Airport Authority never applied its contract fines, we are looking forward to the creative measures the Airport Authority will develop to ensure the respect of official languages obligations.

Recommendation 6

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

The Airport Authority's work plan

- Corporate Paralegal is currently working on hosting a "lunch and learn" with some of the federal institutions and air carriers located at the airport (Q2 2010)

Our comments

Although the Airport Authority indicates its intent of holding a "lunch and learn," we feel that it should go far beyond a specific activity and take the lead in establishing an official joint working group with other federal institutions to discuss and address official languages issues.

Recommendation 7

The Commissioner recommends that the Halifax International Airport Authority review the language designation of its positions so that a sufficient number of bilingual positions exist to ensure the availability of services in both official languages, and that the travelling

public can communicate with the Airport Authority in the official language of its choice. At the same time, this review should also address language training and recruitment needs.

The Airport Authority's work plan

- When the incumbents retire, staff Human Resources Administrative Assistant and Customer Relations Manager positions as bilingual positions (as required)
- Corporate Paralegal (and possibly other employees as required or funding is received) to commence French language training (Q2 2010)
- Actively recruit bilingual volunteers (Q4 2010)

Our comments

In its work plan, the Airport Authority indicates measures to staff two positions as bilingual when the incumbents of those positions retire; however, we are of the view that more concrete measures need to be taken in the meantime to ensure the delivery of services in both official languages.

As for the active recruitment of bilingual volunteers, this is an excellent activity that we support strongly and should be done on an ongoing basis.

Recommendation 8

The Commissioner recommends that the Halifax International Airport Authority:

a) implement formal mechanisms for the effective and efficient monitoring of compliance with the *Official Languages Act* from all contracted service providers at the Halifax Stanfield International Airport that are required to provide their services in both official languages;

The Airport Authority's work plan

- Subject to federal funding, investigate possibility of staffing for official languages compliance (Q4 2010)

b) develop and implement innovative measures to encourage contracted service providers to meet their official languages obligations.

The Airport Authority's work plan

- Encourage federal government to be creative and fund innovative measures to encourage compliance (Q4 2010)

Our comments

We had expected a more proactive response. The submitted work plan on this recommendation is somewhat vague and contingent on federal funding. We would like to reiterate that compliance with the *Official Languages Act* is mandatory and was a part of the agreement the Airport Authority signed with the government to take control of the management of the airport.

Monitoring compliance with the *Official Languages Act*, as with all other acts and regulations the Airport Authority is subject to, is an essential part of management. We strongly encourage the Airport Authority to look for innovative and alternative means of carrying out its obligations in this respect. Furthermore, we expect the Airport Authority to show leadership and commitment in this area as well as in the promotion of linguistic duality.

Recommendation 9

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

The Airport Authority's work plan

- Continue to engage Francophone community through Community Consultative Committee (ongoing)

Our comments

We look forward to the increased implication of the Francophone community at the Halifax Stanfield International Airport.

Appendix B: Audit objectives and criteria

The overall purpose of the audit was to determine the extent to which the current management of its official languages program allows the Halifax International Airport Authority (Halifax Stanfield International Airport) to effectively carry out its obligations with respect to official languages.

Accordingly, the objectives and criteria of the audit are the following:

Objectives	Criteria
<p>1. Leadership</p> <p>Determine if the Airport Authority is committed to the effective implementation of the <i>Official Languages Act</i>.</p>	<p>1.a) Verify whether the Airport Authority has developed and implemented a corporate strategy, an accountability framework and an action plan, and provides adequate resources to ensure the effective management of its official languages program;</p> <p>1.b) Verify whether measures have been taken by the Airport Authority's management, including the Board or Directors, to increase the visibility and the integration of official languages into corporate documents and the corporate culture;</p> <p>1.c) Verify whether the Airport Authority is effectively communicating its official languages policies, plans and procedures to its managers, employees, specific contracted service providers and third parties under contract, and whether these groups know their rights and understand their responsibilities under the <i>Official Languages Act</i>;</p> <p>1.d) Verify the extent to which the Airport Authority engages federal institutions located at the airport in providing bilingual services at the Halifax Stanfield International Airport.</p>
<p>2. Infrastructure and Monitoring</p> <p>Determine if the Airport Authority has the appropriate structures and resources in place to ensure the effective management of its official languages program, its coordinating role and overall compliance with the <i>Official Languages Act</i>.</p>	<p>2.a) Verify whether the Airport Authority has implemented effective human resources management practices (recruitment, staffing, training and performance agreements) to ensure full compliance with its official languages obligations;</p> <p>2.b) Verify whether there is an effective mechanism in place to deal with complaints related to official languages so that accountable managers are personally involved in identifying and implementing corrective action that will provide a lasting solution to the problem;</p> <p>2.c) Verify whether the Airport Authority ensures appropriate monitoring of its services and those provided by airlines, specific contracted service providers and health and safety service providers, and appropriate coordination with federal institutions subject to the <i>Official Languages Act</i> located at the airport;</p> <p>2.d) Verify whether the Airport Authority involves the official language minority community in seeking improvements that could be made to enhance the bilingual image of the airport either alone or in collaboration with federal institutions (service quality assurance);</p> <p>2.e) Verify whether the Airport Authority reports to the authority in charge of its official languages obligations on a regular basis.</p>