



Office of the
Commissioner of
Official Languages

Commissariat
aux langues
officielles

AUDIT

OF SERVICE DELIVERY IN ENGLISH
AND FRENCH TO AIR CANADA PASSENGERS

FOLLOW-UP
February 2015



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In September 2011, the Office of the Commissioner of Official Languages published an audit of service delivery in English and French to Air Canada passengers. This audit was conducted between April and December 2010, and examined Air Canada headquarters, seven airports (St. John's, Halifax, Montréal, Ottawa, Toronto, Winnipeg and Vancouver) and two call centres. The 12 recommendations to the institution were intended to improve delivery of bilingual services to the public, in accordance with Part IV of the *Official Languages Act* (the Act). The recommendations and the findings of the follow-up to this audit are in Appendix A.

The 12 recommendations had the following four objectives:

- Ensure that Air Canada senior management is committed to implementing Part IV of the Act, thereby providing Air Canada passengers with services of equal quality in both official languages.
- Ensure that Air Canada provides services of equal quality in both official languages in airports in which it has language obligations and on board flights on designated bilingual routes, and that it actively offers and provides passengers with effective services in both official languages.
- Ensure that Air Canada consults representatives of official language minority communities in the various regions and that it takes the results of these consultations into consideration when planning for the provision of bilingual services.
- Ensure that Air Canada effectively monitors its performance in the delivery of services of equal quality in both official languages, in the air and on the ground.

In April 2013, the Office of the Commissioner of Official Languages initiated a follow-up to the audit in order to evaluate and document the measures taken by Air Canada to implement the Commissioner's recommendations.

METHODOLOGY

The results of the audit follow-up are the product of an analysis of the progress report and action plan sent by Air Canada in response to the recommendations made in the initial audit, as well as an analysis of the supporting documents provided by Air Canada and information obtained during interviews.

As part of this audit follow-up, we focused on Halifax, Toronto, Winnipeg and Vancouver airports to examine and evaluate the delivery of ground services, and Montréal airport to examine inflight services.

In November and December 2013 and May 2014, as part of the follow-up, we conducted 50 interviews with airport directors and managers at different levels, lead agents, customer sales and service agents, pursers, flight attendants, and representatives of Unifor working in these four airports. In January 2014, we had an interview at headquarters with the General Manager, Linguistic Affairs and Diversity.

ANALYSIS OF FINDINGS AND RECOMMENDATIONS

OBJECTIVE 1: ENSURE THAT AIR CANADA SENIOR MANAGEMENT IS COMMITTED TO IMPLEMENTING PART IV OF THE OFFICIAL LANGUAGES ACT, THEREBY PROVIDING AIR CANADA PASSENGERS WITH SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES.

SENIOR MANAGEMENT'S COMMITMENT

In recommendations 1 to 7 below, the Commissioner recommended that Air Canada develop an accountability framework and ensure it has the necessary human and financial resources to implement Part IV of the Act. He also recommended establishing a new official languages action plan and a new directive or policy that covers all of its responsibilities as set forth under Part IV of the Act. Air Canada was required to take concrete and effective measures to raise awareness among managers and front-line employees of their responsibilities pertaining to the active offer and delivery of bilingual services. In the mechanisms for evaluating the performance of senior executives, managers and front-line employees, Air Canada also was required to include a section on implementing Part IV of the Act. It also had to examine all collective agreements when negotiating with the unions and make appropriate revisions that will enable it to fully comply with its official languages requirements.

The following paragraphs present the Commissioner's recommendations and the results of our evaluation by subject.

OFFICIAL LANGUAGES ACCOUNTABILITY FRAMEWORK

RECOMMENDATION 1

The Commissioner of Official Languages recommends that Air Canada develop and implement an accountability framework for official languages in order to clearly define the roles and responsibilities of its personnel with respect to the various requirements of the *Official Languages Act*, particularly those relating to bilingual service delivery. This framework should also include coordination mechanisms and determine how managers will be held accountable. It should be communicated to all personnel.

Air Canada does not have an official languages accountability framework, although its official languages policy and directives include a section on institutional responsibilities. This section presents only the responsibilities of the President and Chief Executive Officer of Air Canada; the Senior Vice-President, Employee Relations; the Linguistic Affairs Unit; and the official languages champions and branches. There is no mention of the official languages responsibilities of airport directors, managers at various levels, service directors, flight attendants, lead agents, or customer sales and service agents. Consequently, Air Canada has not implemented the first recommendation.

HUMAN AND FINANCIAL RESOURCES

RECOMMENDATION 2

The Commissioner of Official Languages recommends that Air Canada ensure it has the necessary human and financial resources to implement Part IV of the *Official Languages Act*.

Air Canada indicated that it has increased its annual budget for the official languages program by two percent since our audit. This increase was intended to cover the salary costs of the new official languages and diversity advisor position created in the Linguistic Affairs Unit in order to improve dialogue and facilitate communications with the communities. We had proposed that Air Canada implement, in the airports, a network of official languages coordinators or working groups to improve and monitor activities related to service delivery in English and French to passengers. We believe that this approach is essential to obtaining real results in the front lines. We believe that appointing only one person to the official languages program at headquarters and not establishing an official front-line structure is not sufficient to obtain concrete results and meet the requirements of the Act. In light of the foregoing, Air Canada has partially implemented Recommendation 2.

OFFICIAL LANGUAGES ACTION PLAN

RECOMMENDATION 3

The Commissioner of Official Languages recommends that Air Canada establish a new action plan on the effective implementation of Part IV and the other parts of the *Official Languages Act* in order to ensure services of equal quality in English and French in its various sectors of activity. This plan should include the visual active offer of bilingual services as well as the active offer of bilingual services in the air, on the ground and in call centres. The plan should include specific measures accompanied by deadlines, performance indicators and an accountability mechanism. For their part, Air Canada directors/managers in airports could also draw up an official languages action plan, presenting specific measures reflecting their particular situations in matters of bilingual service delivery. These plans, which could be based on Air Canada's plan, should be communicated to all personnel.

Air Canada has developed the *Air Canada Linguistic Action Plan: Communications with and Services to the Public 2011–2014*. The plan has six sections: management's commitment and leadership, recruitment, communication and training, service standards, audits and performance, and communities. It also sets out the responsibilities for various activities and the projected timeframes.

This plan is incomplete. For example, it does not contain performance indicators or an accountability mechanism. These elements are fundamental to adequately monitor Air Canada's obligations under Part IV of the Act. In general, the institution's official languages action plan does not set out specific, rigorous and concrete measures for effectively implementing Part IV and the other parts of the Act. It should be noted that Air Canada has failed to include in this plan specific measures to follow up on the recommendations made by the Commissioner of Official Languages in this audit.

Moreover, this plan does not state who is responsible for implementing and following up on it. We noted that this plan refers to official languages coordinators, but this network does not exist.

The official languages action plan (2011–2014) was communicated by e-mail and during a presentation to the managers responsible for the different sectors of activity. However, our interviews found that airport directors and managers responsible for ground services were unaware of the existence of an official languages action plan. The people we interviewed were unable to tell us what their responsibilities were under this plan. Nevertheless, one of the objectives of this plan is "to guide managers and employees in implementing the language policy." In summary, the official languages action plan has not been effectively communicated to all personnel, as required by Recommendation 3.

Furthermore, Air Canada has not followed our suggestion that airport managers and directors draw up an official languages action plan, presenting specific measures reflecting their particular situations in matters of bilingual service delivery.

Air Canada has therefore partially implemented Recommendation 3.

OFFICIAL LANGUAGES POLICY AND DIRECTIVE

RECOMMENDATION 4

The Commissioner of Official Languages recommends that Air Canada develop a new directive or policy that takes into account its structure and its realities, and that covers all of its responsibilities as set forth under Part IV of the *Official Languages Act*. This policy should be effectively communicated to all of its personnel, and reminders should be sent regularly to ensure its implementation.

Air Canada has developed a new framework, *Official Languages at Air Canada – Policy and Directives*, which came into effect in February 2012. Air Canada chose to include in this policy all the components of Part IV of the Act applying to bilingual airports and inflight services.

The subjects covered in the policy include Air Canada's official languages guidelines, language requirements in assigning positions, translation, language training and language tests, as well as language of work. Several appendices provide references, examples and memory aids. The policy is posted on ACAeronet, Air Canada's intranet site, and all the personnel we met know that the institution must provide services in English and French. Recommendation 4 has therefore been satisfactorily implemented by Air Canada.

EMPLOYEE AWARENESS

RECOMMENDATION 5

The Commissioner of Official Languages recommends that Air Canada take concrete and effective measures to raise awareness among managers, service directors, flight attendants, lead agents, and customer sales and service agents of the company's responsibilities pertaining to the active offer and delivery of bilingual services under Part IV of the *Official Languages Act*.

Air Canada continues to use a number of methods to inform and raise awareness among managers and front-line employees of official languages obligations: its three intranet sites, periodicals, bulletins, a mandatory on-line training module and the *Ovation* training program for flight attendants, and banners on the active offer of bilingual service in the employees' centres. The institution gives reminders on active offer during the Linguistic Affairs Unit's open house and during presentations given to certain managers. New employees' orientation sessions include a component on Air Canada's official languages obligations and the video on active offer of bilingual service. This video was also presented to sales and service managers at Toronto airport, an initiative of this airport that should be reproduced at the other airports and with front-line employees.

During our visit to the Toronto airport, we obtained a copy of the work descriptions of front-line personnel, which were developed by the managers of this airport. These documents set out the duties of agents assigned to check-in counters, boarding gates and special services, and clearly set out their obligation to always greet passengers with "Hello, Bonjour." We also obtained copies of the generic work descriptions for all front-line employees in all airports, which also state that employees must greet passengers with "Hello, Bonjour."

Although a variety of written measures are taken to raise employee awareness, we are concerned by the lack of active offer and delivery of bilingual service that we observed at various points of service during our visits. Our interviews revealed that all the employees working in the airports, including directors, managers at all levels, lead agents, and customer sales and service agents, were not fully informed of their responsibilities under Part IV of the Act. Flight attendants seemed to be better informed and understood Air Canada's official languages obligations. Furthermore, none of the people we interviewed were aware that active offer of bilingual service in person is a requirement of the Act. We believe that the measures put in place by Air Canada to inform all employees are not effective enough to meet the requirements related to active offer and delivery of bilingual services.

We therefore consider that Recommendation 5 has been only partially implemented, because we did not see concrete results in the front lines.

PERFORMANCE EVALUATION

RECOMMENDATION 6

The Commissioner of Official Languages recommends that Air Canada include a section on implementing Part IV of the *Official Languages Act* in its mechanisms for evaluating the performance of senior managers, as well as a section on respecting Air Canada's language obligations in the performance evaluation program it will adopt for other managers, airport directors, service directors, flight attendants, lead agents, and customer sales and service agents, as well as the new official languages coordinators.

The directors and managers we met with during our visits to the airports confirmed that there is no objective related to official languages and Air Canada's obligations in the performance evaluation. In addition, although Air Canada maintains that it monitors employees' performance by using work descriptions, all the front-line employees we met with told us that they are not evaluated on official languages. In summary, as revealed during the interviews, there do not seem to be consequences for personnel who do not comply with the institution's obligations under Part IV of the Act.

Air Canada has not implemented Recommendation 6.

COLLECTIVE AGREEMENTS

RECOMMENDATION 7

The Commissioner of Official Languages recommends that, when negotiations begin, Air Canada fully examine all collective agreements for the Canadian Union of Public Employees and the National Automobile, Aerospace, Transportation and General Workers Union of Canada (CAW), including all letters of agreement relating to official languages, and make appropriate revisions that will enable Air Canada to fully comply with the requirements of Part IV of the *Official Languages Act*. In particular, Air Canada should negotiate with CAW to find an approach that will allow for greater flexibility in the assignment of bilingual agents to shifts and in service areas as well as in the number of bilingual agents required to provide Air Canada passengers with services of equal quality in English and French in all Canadian airports in which Air Canada has language obligations. All details relating to official languages should be included in the collective agreements.

Our review of the documentation received indicates that no changes were made to the Canadian Union of Public Employees (CUPE) collective agreement, or to the annexed letter of agreement on official languages, and that there were no discussions on official languages during the last negotiations with the union. The text of the collective agreement resulting from negotiations with CAW, now replaced by Unifor, has not been revised and therefore does not contain Air Canada's obligations to deliver bilingual services. Moreover, the minimum number of bilingual positions required for each airport, as set out in the letter of agreement (no. 6), has not increased since the previous collective agreement. However, the letter of agreement has been revised and now contains a clause on designated bilingual work shifts. A new provision indicates that bilingual employees could be required to carry out designated duties at strategic points in addition to the clause stating that these employees may be asked to work, in order of seniority, during designated bilingual work shifts.

An official languages subcommittee, consisting of representatives of the union, labour relations, operations, and the Linguistic Affairs Unit, was established at the beginning of 2013. This subcommittee is part of the expanded working committee, which is also composed of national and provincial representatives of the unions, labour relations, and human resources.

The Unifor union representatives we met at the airports informed us that only the national and provincial union representatives participate in discussions on official languages with Labour Relations and Human Resources. We also learned during our interviews with flight attendants that there is a union committee on bilingualism for members of Local 4091 assigned to the Montréal flight attendant base. The mandate of this committee is defined in section 21.03 of the CUPE collective agreement. The information that we received shows that this committee works alone. The committee has expressed interest in working in partnership with the Linguistic Affairs Unit.

Air Canada has partially implemented Recommendation 7.

OBJECTIVE 2: ENSURE THAT AIR CANADA PROVIDES SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES IN AIRPORTS IN WHICH IT HAS LANGUAGE OBLIGATIONS AND ON BOARD FLIGHTS ON DESIGNATED BILINGUAL ROUTES, AND THAT IT ACTIVELY OFFERS AND PROVIDES PASSENGERS WITH EFFECTIVE SERVICES IN BOTH OFFICIAL LANGUAGES.

The Commissioner's recommendations 8, 9 and 10 below seek to establish uniform standards for signage and visual active offer, and to develop a strategy to ensure that flight attendants and customer sales and service agents understand the importance of bilingual greetings and an active offer of services in both official languages on board aircraft and in airports. They also seek to rigorously examine the number of front-line employees required to provide service of equal quality in English and French in airports and in flight, as well as to examine the planning for the provision of bilingual services for all its activities, as well as the assignment of bilingual agents to various service areas.

SIGNAGE AND VISUAL ACTIVE OFFER

RECOMMENDATION 8

The Commissioner of Official Languages recommends that Air Canada carry out an analysis of its bilingual service signage in all service areas in which passengers circulate, and subsequently establish consistent standards regarding the positioning of bilingual service pictograms and develop a monitoring mechanism that ensures compliance with these standards and with the *Official Languages Act*.

Air Canada indicated that its Marketing department examined the signage in all the airports to ensure consistency of bilingual signage, and corrections were made. No procedures or standards were presented regarding the positioning of pictograms, and no report on this evaluation was provided, even though we did ask for one. We have observed significant shortcomings in terms of the use of pictograms in all service areas and all airports we visited. Therefore, Air Canada has not implemented Recommendation 8.

ACTIVE OFFER IN PERSON, AND SERVICE PROVIDED IN ENGLISH AND FRENCH

RECOMMENDATION 9

The Commissioner of Official Languages recommends that Air Canada develop a strategy to ensure that flight attendants and customer sales and service agents understand the importance of bilingual greetings and that they make an active offer of services in both official languages on board aircraft and in airports where Air Canada has language obligations in order to comply with the requirements of the *Official Languages Act*.

As we mentioned above, information on official languages, including the video on active offer of bilingual service, is presented only to new employees. We observed that established employees do not fully grasp Air Canada's obligations related to active offer in person and the delivery of bilingual services. According to the documentation we received, Air Canada has not developed an official strategy to ensure that flight attendants and customer sales and service agents understand the importance of bilingual greetings and make an active

offer of services in English and in French on board aircraft and in airports. However, since our initial audit, it has created banners on the active offer of bilingual service and a mandatory on-line *Hello/Bonjour* training course for cabin crew. We believe that this training should also be mandatory for front-line employees working in the airports.

Air Canada also developed and implemented the *Ovation* training program for flight attendants, which includes a component on greeting passengers in both official languages by saying "Hello, Bonjour" at the time of boarding.

We conclude that Air Canada has partially implemented Recommendation 9.

BILINGUAL CAPACITY AND PROVISION OF BILINGUAL SERVICES

RECOMMENDATION 10

The Commissioner of Official Languages recommends that Air Canada thoroughly examine:

- a) the number of bilingual service directors, flight attendants, lead agents, customer sales and service agents, and managers required to ensure that services of equal quality are provided in English and French inflight and in airports where Air Canada has language obligations across Canada, and
- b) the planning for the provision of bilingual services for all its activities, as well as the assignment of bilingual agents to various service areas (including the cockpit) in order to maximize its resources.

Although Air Canada has provided grids showing representation of bilingual agents in the different airports, our examination of the documentation and our interviews reveal that since our initial audit, Air Canada has not thoroughly examined the representation of front-line airport employees or determined the number required to provide service of equal quality in English and French at all times.

The Air Canada Linguistic Affairs Unit informed us that the total number of bilingual employees has increased by two percent since our initial audit. It should be pointed out that the Edmonton airport has increased its bilingual capacity by 12% over the past three years as a result of a targeted recruitment campaign and the cooperation of a Francophone association in the region. We salute this initiative, which produced good results; we encourage Air Canada to continue in the same vein in other regions.

Despite this, and in light of the official languages issues, we find that the institution has not thoroughly examined bilingual positions in all the airports.

Regarding the provision of bilingual services, our analysis found a lack of bilingual ground agents to provide services at various points of service, and even an absence of bilingual agents during certain shifts. For certain airports, the minimum required number of bilingual ground agents is clearly insufficient as a percentage of employees. To fill this gap, Air Canada has set up a telephone line that unilingual agents can call to reach translation services to assist passengers who speak the minority language. This approach does not provide service of equal quality in English and French. We were informed by Air Canada that the assignment of bilingual employees does not apply to flight crew, since the pilots do not interact directly with the public and bilingualism is not part of the requirements of their position. However, the in-charge flight attendants must translate all pilot-to-passenger communications into the minority language.

In light of the foregoing, Air Canada has not implemented Recommendation 10.

OBJECTIVE 3: ENSURE THAT AIR CANADA CONSULTS REPRESENTATIVES OF OFFICIAL LANGUAGE MINORITY COMMUNITIES IN THE VARIOUS REGIONS AND THAT IT TAKES THE RESULTS OF THESE CONSULTATIONS INTO CONSIDERATION WHEN PLANNING FOR THE PROVISION OF BILINGUAL SERVICES.

RECOMMENDATION 11

The Commissioner of Official Languages recommends that Air Canada consult official language minority communities in order to take their specific needs into account when making decisions that affect route planning and bilingual services. During its regular and formal consultations with various concerned parties, Air Canada should target national, provincial and regional representatives of official language minority communities and inform them of any decisions made.

In its progress report, Air Canada indicated that it wanted to improve dialogue and facilitate discussion with certain linguistic community representatives. Our review of the documentation shows that discussions took place in 2013 with representatives of these communities in Vancouver and Calgary as part of a recruitment campaign for agents from Francophone communities to meet Air Canada's bilingual capacity needs. While these dialogues are a good practice, they do not constitute formal and regular consultations as required by the recommendation. Air Canada has not implemented Recommendation 11.

OBJECTIVE 4: ENSURE THAT AIR CANADA EFFECTIVELY MONITORS ITS PERFORMANCE IN THE DELIVERY OF SERVICES OF EQUAL QUALITY IN BOTH OFFICIAL LANGUAGES, IN THE AIR AND ON THE GROUND.

RECOMMENDATION 12

The Commissioner of Official Languages recommends that Air Canada institute structured monitoring mechanisms in order to ensure the availability and quality of services in both official languages in all its areas of activity, as well as those of Jazz, both inflight on designated bilingual routes and in airports where Air Canada has language obligations. Air Canada should take all necessary measures to address the shortcomings noted during the monitoring process and periodically report on results.

The institution reports that Ipsos Reid continues to conduct monthly surveys of a sample of clients who travelled on Air Canada flights. During our interviews, we learned that the institution is not taking specific measures to address any negative results identified by these surveys.

A quality assurance team has been set up to conduct service audits in the airports. We have been informed that the Toronto airport conducts these audits every day. Grids have been developed to evaluate the quality of services offered in English and French in the airports. We attempted to learn the methodology used to conduct these audits, including their frequency in relation to the different work shifts; this information was not available. We received the results for only four international airports in Canada where service audits were conducted in 2012 and 2013. These results were part of a presentation to managers of the operations branch. The results showed significant declines in terms of announcements made in both official languages at departure gates for three of the four international airports audited. For example, from 2012 to 2013, the respective results of these three airports declined from 88% to 0%, from 75% to 24% and from 32% to 19%. During this period, the results remained stable at 38% and 39% for the fourth airport. Our analysis found that the service audits are not conducted uniformly. In 2013, the audits were conducted at departure gates 10 times in one airport, 28 and 38 times in two other airports, and 220 times in the largest airport in Canada. We believe that Air Canada must establish a reliable methodology to enable it to have a picture of the true situation regarding the quality of bilingual services that it offers passengers, and take every measure necessary to correct the shortcomings observed during monitoring.

Air Canada has partially implemented Recommendation 12.

CONCLUSION

The Commissioner is satisfied with the implementation of only one recommendation, Recommendation 4. He is only partially satisfied with the response to Recommendations 2, 3, 5, 7, 9 and 12. Recommendations 1, 6, 8, 10 and 11 have not been implemented. The results of our evaluation reveal that Air Canada has not fully carried out the action plan that it provided us during the initial audit for implementing all the recommendations.

We recognize the efforts made by Air Canada to develop and implement its new official languages policy and directive. As well, its targeted recruitment efforts in Edmonton have borne fruit. Since our initial audit, Air Canada has also published articles on its linguistic duality obligations in its bulletins and periodicals, and it has posted its action plan and its new official languages policy on its intranet site. It also developed and implemented mandatory training for flight attendants on the active offer of bilingual services.

To make progress, Air Canada must immediately make senior executives (including directors) and managers at all levels accountable by setting specific official languages objectives. These key people must set the tone loudly and clearly for front-line employees. Along the same lines, Air Canada must develop an official languages accountability framework quickly that takes into account all its activities.

We also encourage Air Canada to establish a network of official languages coordinators. We believe that this network of managers and front-line ground and inflight employees would enable collaboration with the Linguistic Affairs Unit in order to share good practices, discuss problems, and resolve problematic situations as they arise.

We would like to emphasize that the official languages action plan is a key document to ensuring that progress is made to comply with the Act. Air Canada should develop a new official languages action plan to fulfill its language obligations. This plan should include specific and tangible measures to resolve longstanding and recurring problems, such as the lack of active offer and delivery of bilingual service, the lack of bilingual announcements, and the lack of bilingual capacity. Air Canada must take into account in this plan all the recommendations that have not been implemented or have been only partially implemented. The institution should ensure that senior executives and key managers in the airports participate fully in developing this plan. This approach should lead

to better cooperation on the front lines and provide accountability, which has not been achieved at Air Canada in the past. In addition to timeframes and responsibilities, the plan should contain performance indicators and an accountability mechanism. It must be approved by senior management and be effectively communicated to all personnel.

Air Canada should examine the provision of bilingual services at various points of service, in particular visual active offer in terms of pictograms and their positioning. It should judiciously examine the assignment of bilingual agents to ensure that passengers can receive and understand all messages in the minority language and be served in the official language of their choice. Air Canada still has work to do to determine the bilingual capacity required and to take corrective action, in addition to better managing the deployment of bilingual agents to various points of service on the ground.

The institution must also have front-line representatives of the two unions (in addition to national and provincial representatives) participate regularly in its official languages consultation process, since they do not receive information in this regard, including complaints about the lack of bilingual service.

In addition, Air Canada must establish a process for formally and regularly consulting official language minority communities at the national, provincial and regional levels to identify their bilingual service needs.

In terms of monitoring mechanisms, Air Canada must establish a reliable methodology enabling it to audit the different points of service in the airports and more closely monitor the results of observations of its ground and inflight service. To do this, a formal monitoring mechanism must be quickly established to enable Air Canada to correct the shortcomings observed.

During the audit follow-up, we were informed about Air Canada's desire to change its organizational culture. We also learned that client service was a business priority for 2014. We believe that it is essential for Air Canada to take this opportunity to improve its official languages program and ensure that active offer and delivery of service in both official languages are an integral part of any cultural change.

We thank Air Canada personnel for their cooperation during this audit follow-up.

APPENDIX A

RECOMMENDATIONS TO AIR CANADA, AND OUR EVALUATION

RECOMMENDATION 1 (NOT IMPLEMENTED)

The Commissioner of Official Languages recommends that Air Canada develop and implement an accountability framework for official languages in order to clearly define the roles and responsibilities of its personnel with respect to the various requirements of the *Official Languages Act*, particularly those relating to bilingual service delivery. This framework should also include coordination mechanisms and determine how managers will be held accountable. It should be communicated to all personnel.

RECOMMENDATION 2 (PARTIALLY IMPLEMENTED)

The Commissioner of Official Languages recommends that Air Canada ensure it has the necessary human and financial resources to implement Part IV of the *Official Languages Act*.

RECOMMENDATION 3 (PARTIALLY IMPLEMENTED)

The Commissioner of Official Languages recommends that Air Canada establish a new action plan on the effective implementation of Part IV and the other parts of the *Official Languages Act* in order to ensure services of equal quality in English and French in its various sectors of activity. This plan should include the visual active offer of bilingual services as well as the active offer of bilingual services in the air, on the ground and in call centres. The plan should include specific measures accompanied by deadlines, performance indicators and an accountability mechanism. For their part, Air Canada directors/managers in airports could also draw up an official languages action plan, presenting specific measures reflecting their particular situations in matters of bilingual service delivery. These plans, which could be based on Air Canada's plan, should be communicated to all personnel.

RECOMMENDATION 4 (IMPLEMENTED)

The Commissioner of Official Languages recommends that Air Canada develop a new directive or policy that takes into account its structure and its realities, and that covers all of its responsibilities as set forth under Part IV of the *Official Languages Act*. This policy should be effectively communicated to all of its personnel, and reminders should be sent regularly to ensure its implementation.

RECOMMENDATION 5 (PARTIALLY IMPLEMENTED)

The Commissioner of Official Languages recommends that Air Canada take concrete and effective measures to raise awareness among managers, service directors, flight attendants, lead agents, and customer sales and service agents of the company's responsibilities pertaining to the active offer and delivery of bilingual services under Part IV of the *Official Languages Act*.

RECOMMENDATION 6 (NOT IMPLEMENTED)

The Commissioner of Official Languages recommends that Air Canada include a section on implementing Part IV of the *Official Languages Act* in its mechanisms for evaluating the performance of senior managers, as well as a section on respecting Air Canada's language obligations in the performance evaluation program it will adopt for other managers, airport directors, service directors, flight attendants, lead agents, and customer sales and service agents, as well as the new official languages coordinators.

RECOMMENDATION 7 (PARTIALLY IMPLEMENTED)

The Commissioner of Official Languages recommends that, when negotiations begin, Air Canada fully examine all collective agreements for the Canadian Union of Public Employees and the National Automobile, Aerospace, Transportation and General Workers Union of Canada (CAW), including all letters of agreement relating to official languages, and make appropriate revisions that will enable Air Canada to fully comply with the requirements of Part IV of the *Official Languages Act*. In particular, Air Canada should negotiate with CAW to find an approach that will allow for greater flexibility in the assignment of bilingual agents to shifts and in service areas as well as in the number of bilingual agents required to provide Air Canada passengers with services of equal quality in English and French in all Canadian airports in which Air Canada has language obligations. All details relating to official languages should be included in the collective agreements.

RECOMMENDATION 8 (NOT IMPLEMENTED)

The Commissioner of Official Languages recommends that Air Canada carry out an analysis of its bilingual service signage in all service areas in which passengers circulate, and subsequently establish consistent standards regarding the positioning of bilingual service pictograms and develop a monitoring mechanism that ensures compliance with these standards and with the *Official Languages Act*.

RECOMMENDATION 9 (PARTIALLY IMPLEMENTED)

The Commissioner of Official Languages recommends that Air Canada develop a strategy to ensure that flight attendants and customer sales and service agents understand the importance of bilingual greetings and that they make an active offer of services in both official languages on board aircraft and in airports where Air Canada has language obligations in order to comply with the requirements of the *Official Languages Act*.

RECOMMENDATION 10 (NOT IMPLEMENTED)

The Commissioner of Official Languages recommends that Air Canada thoroughly examine:

- a) the number of bilingual service directors, flight attendants, lead agents, customer sales and service agents, and managers required to ensure that services of equal quality are provided in English and French inflight and in airports where Air Canada has language obligations across Canada, and
- b) the planning for the provision of bilingual services for all its activities, as well as the assignment of bilingual agents to various service areas (including the cockpit) in order to maximize its resources.

RECOMMENDATION 11 (NOT IMPLEMENTED)

The Commissioner of Official Languages recommends that Air Canada consult official language minority communities in order to take their specific needs into account when making decisions that affect route planning and bilingual services. During its regular and formal consultations with various concerned parties, Air Canada should target national, provincial and regional representatives of official language minority communities and inform them of any decisions made.

RECOMMENDATION 12 (PARTIALLY IMPLEMENTED)

The Commissioner of Official Languages recommends that Air Canada institute structured monitoring mechanisms in order to ensure the availability and quality of services in both official languages in all its areas of activity, as well as those of Jazz, both inflight on designated bilingual routes and in airports where Air Canada has language obligations. Air Canada should take all necessary measures to address the shortcomings noted during the monitoring process and periodically report on results.

