



Office of the
Commissioner of
Official Languages

Commissariat
aux langues
officielles

AUDIT

OF THE AVAILABILITY OF LEARNING SERVICES
IN ENGLISH AND IN FRENCH AT THE CANADA
SCHOOL OF PUBLIC SERVICE

FINAL REPORT

November 2017



www.officiallanguages.gc.ca



To reach the Office of the Commissioner of Official Languages
or to obtain a copy in an alternative format,
dial toll-free 1-877-996-6368.
www.officiallanguages.gc.ca

© Minister of Public Services and Procurement 2017
Cat. No.: SF31-133/2017E-PDF
ISBN: 978-0-660-23631-5

TABLE OF CONTENTS

HIGHLIGHTS	1
Context	1
Findings	1
INTRODUCTION	3
Context: The Canada School of Public Service and its transformation	3
Methodology	4
GOVERNANCE STRUCTURE	5
Official languages governance instruments	5
Official languages action plan	5
Official languages champion and consideration of official languages by senior management	5
Consideration of official languages by other committees	6
Strategic and operational planning	6
Communicating to employees about language obligations	7
UNDERSTANDING NEEDS IN ENGLISH AND FRENCH AND DESIGNING LEARNING ACTIVITIES	7
Understanding learning needs	7
Designing learning activities	8
Content acquisition	10
PROMOTION AND AVAILABILITY OF LEARNING ACTIVITIES OF EQUAL QUALITY IN ENGLISH AND FRENCH	11
Promotion of learning activities in English and French	11
Communications between School staff and other federal employees	11
Availability of learning activities of equal quality in English and French	12
QUALITY ASSURANCE AND EVALUATION	14
Post-learning quality assurance	14
Course evaluations by learners	14
Complaints and feedback about official languages	14
Evaluation, audit and accountability	15
Official languages and performance evaluations	15
CONCLUSION	16
APPENDIX A AUDIT OBJECTIVES AND CRITERIA	17
APPENDIX B RECOMMENDATIONS, THE CANADA SCHOOL OF PUBLIC SERVICE'S COMMENTS AND ACTION PLAN, AND THE INTERIM COMMISSIONER OF OFFICIAL LANGUAGES' COMMENTS	18

HIGHLIGHTS

CONTEXT

Since 2014, the Canada School of Public Service (the School) has been transforming its business model from a cost recovery model to a model based mainly on appropriations at no charge to learners. The goal of the transformation is to offer a common core curriculum and career development programs to more federal employees than ever before. Much of the required training has been moved on-line.

The audit was based on section 37 of Part V of the *Official Languages Act* (the Act).¹ It looked at the transformation of the School and of the learning services it provides to federal employees, except for language training. Appendix A lists the audit objectives and criteria. The audit was conducted in the final third of the transformation, which ran from 2014 to 2017. This was a particularly opportune time because the transformation was both far enough along to be able to gauge its impact and at a stage where the School was consolidating its practices on several fronts.

FINDINGS

General finding

- School employees have a positive attitude toward official languages; however, at the time of the audit, the School's specific obligations under section 37 of the Act were not always well understood and were not incorporated into its governance. Official languages must be taken into account in all School activities. They are a shared responsibility and do not fall under the sole responsibility of a specific group.
 - » To improve its official languages compliance over the long term, the School must put processes in place that take federal employees' official language needs into account when learning events and activities are designed, planned, promoted and delivered, both in person and on-line, and when quality assurance of those events and activities is performed.

Governance structure

- Several key official languages governance tools, such as policies, directives and quality assurance mechanisms, did not exist at the time of the audit. Furthermore, the *Official Languages Action Plan 2014–2016* did not specifically take into account the School's obligations under section 37 of the Act.
 - » It is important that the School revise existing framework documents and develop new ones so that its obligations under section 37 of the Act are taken into account. It must then communicate them to all staff promptly and effectively.

Designing learning activities

- The School's practices for consulting other federal institutions and measuring demand did not take official languages into account. Two elements emerged, in particular:
 - 1) Some regions did not measure demand for in-person courses or events.
 - 2) It was not possible to demonstrate through the audit that learning needs in English and in French were systematically included in formal discussions with other federal institutions in the regions or in the National Capital Region.
 - » It is important for the School to implement processes and fully understand the needs of federal employees throughout Canada with regard to learning in the official language of their choice, to adapt its courses accordingly and to be proactive in adapting its courses.
- Since 2015–2016, the School has required pilot courses to be in both official languages.
 - » To ensure long-term success, this requirement must be set out in the School's governance.
- In the design stage, validating the content to ensure equal quality in both official languages was done during the editing and translation process and during a high-level committee review. However, validation was primarily the designer's responsibility, and there was not enough support for these designers.
 - » The School must ensure that all of its designers are using the same tools consistently: for example, by making its guide for instructional designers mandatory.
- On-line courses purchased from third parties following a call for tenders were withdrawn in 2016 because they were not of equal quality in both official languages. Until then, the School had assumed that the bidders guaranteed quality. The School acknowledged this shortcoming but at the time of the audit had yet to put any formal mechanisms in place to evaluate the quality of its products.
 - » The School must put formal mechanisms in place to validate language quality and ensure equivalence in both official languages of all on-line content before making it available to learners.

¹ Section 37: "Every federal institution that has authority to direct, or provides services to, other federal institutions has the duty to ensure that it exercises its powers and carries out its duties in relation to those other institutions in a manner that accommodates the use of either official language by officers and employees of those institutions."

Promotion and availability of learning activities

- The audit found only minor concerns regarding external promotion and communication in both official languages. In terms of service in the official language of the federal employee's choice, each region had positions that were designated as bilingual; however, training of School employees in this area was recommended rather than required.
 - » School employees must be trained systematically on serving federal employees in the official language of their choice.
- In-person courses are now posted for longer periods. Whether they are given depends on how many people register. However, at the time of the audit, courses were not systematically scheduled in both official languages in the regions, despite the direction given by senior management. There were no learning activities in the official language of the linguistic minority on the schedule in Toronto or in Québec City. Moreover, even though course cancellation thresholds do not necessarily need to be identical in all circumstances, they were not applied systematically across the country, and the School rarely offered alternatives that considered the travel costs that must be paid by the learners and their institutions.
 - » The School must put mechanisms in place to ensure that scheduling and availability of learning activities are based on clearly defined criteria so that they are delivered consistently across Canada. The School would also do well to be proactive in offering alternative solutions to learners.
- Events have become an increasingly important delivery method for the School. All national events, which are webcast, have included simultaneous interpretation since 2016. However, this was not specified in any governance instruments at the time of the audit.
 - » It is important that the School's governance instruments include official languages rules and standards for its events across the country.

Quality assurance and evaluation

- The School did not have a way to ensure or evaluate the quality of both official languages in its learning products after they are delivered.
 - » To ensure full compliance and improve flexibility in its service offering, it is important for the School to set up an independent function for ensuring and evaluating equal quality, to survey learners on questions of quality and timely availability in the official language of their choice, and to develop an internal process for handling complaints.
- Executive performance agreements contained a statement on language of work, but executives were not evaluated on meeting the obligations under section 37 of the Act.
 - » Including official languages in all employees' performance evaluations—in a way that is appropriate to the nature and scope of their duties—is a key ingredient of long-term official languages success.

Recommendations

The Interim Commissioner of Official Languages has made five recommendations to help the School address the shortcomings listed above. The recommendations are listed in Appendix B.

The Interim Commissioner is satisfied with the measures and timelines proposed in the School's action plan regarding the implementation of the five recommendations. Appendix B also contains the School's comments and action plan for each recommendation, as well as the Interim Commissioner's comments. Within 18 to 24 months after the publication of the final audit report, the Office of the Commissioner of Official Languages will follow up on whether the School has implemented the recommendations.

INTRODUCTION

CONTEXT: THE CANADA SCHOOL OF PUBLIC SERVICE AND ITS TRANSFORMATION

In 2016–2017, during the transformation of the Canada School of Public Service (the School), the Commissioner of Official Languages initiated this audit of the learning activities that the School offers to federal employees. The audit focused specifically on the School's obligations under section 37 of Part V of the *Official Languages Act* (the Act), which imposes specific language obligations on federal institutions, including the School, that have the authority to direct other federal institutions or that provide services to them. The audit's objectives were to ensure that the School is taking its obligations into account when planning and designing learning activities, that these activities are of equal quality in both official languages and that they are available to English- and French-speaking federal employees in a timely manner. The audit also sought to confirm that the School has mechanisms in place for its learning activities to ensure monitoring and continuous improvement with regard to official languages.

The School has a legislative mandate to provide a range of learning activities to build individual and organizational capacity and management excellence within the public service.² Created in 2004, the School serves the federal institutions listed in schedules I, IV and V of the *Financial Administration Act* (i.e., all federal departments and certain federal institutions considered as separate employers). The Treasury Board's *Common Services Policy* lists the School as a common service organization. The School has a head office in Ottawa, Ontario, a large campus in Gatineau, Quebec, and a dozen offices across Canada.

The School has four types of learning activities:

- Classroom courses with an instructor
- Non-interactive on-line courses
- Interactive on-line or distance courses using technologies such as WebEX and virtual classes
- One-time regional or national events, such as learning events organized for specific groups of employees

These all fall under two types of programs:

- Individual learning activities, in the classroom or on-line
- Key transition programs, composed of cohorts³

In 2014–2015, the School began a major transformation of its business model, moving from a cost recovery model—which offered classroom-based general courses on a wide range of popular subjects and customized training developed for federal institutions—to a model based mainly on appropriations at no charge to learners. Learning is now based on a common curriculum that supports Government of Canada priorities. According to the School, the new business model is having a positive impact on the way it manages official languages, and particularly on the availability of learning activities in English and French. The major shift toward common learning and on-line training through the GC campus platform, which is where a large part of the required training has been transferred, means consistent access across Canada. The transformation was also an opportunity to centralize operational planning, which is more effective for taking official languages into account, according to several people who were consulted during the audit.

The audit was conducted in the final third of the transformation, which ran from 2014 to 2017. This was a particularly opportune time because the transformation was both far enough along to be able to gauge its impact and at a stage where the School was consolidating its practices on several fronts.

² Canada School of Public Service, *Departmental Plan 2017–18*, Ottawa, 2017, p. 5. On-line version (www.cspc-efpc.gc.ca/About_Us/currentreport/dp2017-18/index-eng.aspx), accessed October 12, 2017.

³ In this case, participants are identified by their federal institution. These programs, such as leadership programs, for example, may involve several components: on-line, in person, in the classroom or in the context of forums, in virtual classrooms, via simulations or experiential learning opportunities, etc.

METHODOLOGY

The audit focused specifically on section 37 of the Act, which defines the School's obligations to federal employees in other institutions:

- » Every federal institution that has authority to direct, or provides services to, other federal institutions has the duty to ensure that it exercises its powers and carries out its duties in relation to those other institutions in a manner that accommodates the use of either official language by officers and employees of those institutions.

The specific obligations of central and common service organizations, including the School, are also set out in the Treasury Board's *Directive on Official Languages for People Management* and *Directive on Official Languages for Communications and Services*.

Objectives and criteria

The audit's objectives and criteria (Appendix A) are reflected in the main sections of this report: governance structure; understanding learning needs in English and French and designing learning activities; promotion and availability of learning activities of equal quality in English and French; and quality assurance and evaluation.

This audit did not examine any measures implemented by the School to promote a bilingual work environment for its own employees,⁴ any actions taken by the School to promote the development and vitality of official language minority communities, or any services offered by the School that are related to learning a second language. Although these issues are of great importance, they were beyond the scope of this audit.

Audit process

An initial meeting was held on April 18, 2016, to present the audit objectives and criteria to members of the School's senior management. The School provided written documentation to show how it was meeting the objectives and criteria. This information was analyzed between May and August 2016. A total of 45 interviews were then conducted between August and December 2016 that brought together instructional designers, customer service staff, resource people in corporate roles, learning managers in the regions and many executives from the National Capital Region and other parts of Canada.

Audit team

Marcel Fallu, Senior Auditor

Nicole Harb, Auditor

Johanne Morin, Assistant Director, Performance Measurement

Jean Marleau, Director, Performance Measurement

⁴ The audit revealed that several measures have been taken since the beginning of the transformation to ensure that all branches of the Canada School of Public Service are creating an environment that is conducive to the use of both official languages by its employees, including the development of tools and an internal awareness campaign to promote the use of participants' preferred official language during staff meetings at the School. The Interim Commissioner of Official Languages finds these measures to be very encouraging.

GOVERNANCE STRUCTURE

OFFICIAL LANGUAGES GOVERNANCE INSTRUMENTS

At the time of the audit, the School was consolidating its governance, an exercise resulting from its transition to the new business model. The audit found that, apart from its *Official Languages Action Plan*, the School did not have any official languages governance instruments, such as a policy, guidelines, an accountability framework or anything else that set out the School's own strategy to meet its obligations under the Act and under the Treasury Board's official languages policy instruments. Consequently, there were no formal governance tools to codify the official languages responsibilities of the various levels and roles within the institution. Such tools make it easier to ensure that efforts are more integrated and coordinated within and among branches.

OFFICIAL LANGUAGES ACTION PLAN

At the time of the audit, the School had an official languages action plan that covered the period from 2014 to 2016. Work to renew the action plan was therefore under way.⁵ The *Official Languages Action Plan 2014–2016* contained numerous measures, many of which could not be taken because of a lack of resources. School officials identified the need for the next action plan to be more focused than the previous one. In the 2014–2016 action plan, many measures were not listed under the proper Part of the Act.⁶ Due to employee turnover, School officials and members of the Official Languages Committee interviewed were unable to explain the reason for this.

In absolute terms, it is true that the various obligations set out in the Act form a whole. What is unique about the School compared to other federal institutions is that its “public” is primarily federal employees. The audit found that the School's additional obligations under section 37 were not fully understood and had not been taken into account in the *Official Languages Action Plan 2014–2016* or in the other governance instruments.

RECOMMENDATION 1

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service review its official languages governance structure by:

- a) revising existing framework documents and developing new ones, including an official languages accountability framework describing the responsibilities of every level, so that its obligations under section 37 of the *Official Languages Act* are taken into account;

THE OFFICIAL LANGUAGES CHAMPION AND CONSIDERATION OF OFFICIAL LANGUAGES BY SENIOR MANAGEMENT

During the course of the audit, the School demonstrated that the champions⁷ had been active leaders who helped to achieve key official languages objectives. The documentation shows, for example, that the Champion played a key role in 2014–2015 in the Official Languages Committee's discussions on designing learning activities. However, the audit found that there had been no formal accountability for implementing the objectives in the *Official Languages Action Plan 2014–2016* and that the workload of the person acting as champion did not take this role into account.

According to documentation submitted by the School, official languages were rarely included on the agenda at senior management committee meetings, except in a general way at certain meetings. Moreover, at the time of the audit, the Champion was not a member of the School's executive committee. Having an active champion with a high enough level of responsibility to be able to support the deputy head would help to foster official languages compliance.⁸ And having the person (or people) who acts as Official Languages Champion participate in senior management committee discussions would have a positive effect on managing official languages at the School, especially in terms of ensuring that official languages issues are promptly addressed.

⁵ Work concerning the new *Official Languages Action Plan* is mentioned in the School's *Integrated Plan*, which is a good practice. Well-informed interviewees reported that the new business model based on the common curriculum is less conducive to maintaining a relationship with official language minority communities than was the case when the *Official Languages Action Plan 2014–2016* was developed. This prompted a need for further reflection on Part VII of the Act. However, because the focus of this audit was on the School's obligations toward employees in other federal institutions, the report does not cover this issue.

⁶ For example, some measures related to the language of learning activities were listed under Part VII of the Act, when they should have been under Part V (more specifically, section 37).

⁷ At the beginning of the transformation, the Vice-President of Learning Programs was designated as the Official Languages Champion. In 2016, the Senior Director for Learning Technologies and Services took over as champion.

⁸ Designating a Champion to support the deputy head in official languages matters is one of the requirements of the Treasury Board's *Policy on Official Languages*.

RECOMMENDATION 1 (CONT.)

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service review its official languages governance structure by:

- b) ensuring that anyone acting as the Official Languages Champion has the means and time necessary to carry out the duties associated with that role, and that his or her performance objectives reflect those responsibilities;
- c) ensuring that senior management discusses the School's language obligations regularly and that anyone acting as the Official Languages Champion can participate in the discussions;

CONSIDERATION OF OFFICIAL LANGUAGES BY OTHER COMMITTEES

At the time of the audit, two committees other than senior management were doing official languages-related work at the School: the Official Languages Committee and the School Content Integration Committee (SCIC).

The Official Languages Committee was created in 2014. At the time of the audit, it was composed of volunteers from various branches of the School and was divided into three subcommittees: one that focused specifically on official languages and instructional design; one that worked mainly on best practices for official languages; and one that acted as a support group for the School's *Official Languages Action Plan*.⁹ The Committee piloted a project to develop the *Guide to Official Languages Best Practices for Instructional Designers*, which in itself is a best practice. The guide is discussed later on in this report in the section on Designing Learning Activities. The Committee, which was active during the School's transformation, was described by interviewees as being functional and competent. Analysis of the documentation confirmed this assessment. Several interviewees raised some issues related to the communication of information and to the composition of the Committee. If the School is experiencing continuing challenges in terms of employee turnover, it should consider a more formal approach to selecting members and think about requiring the Committee to include members from every branch.

At the time of the audit, SCIC had an important role in terms of official languages and learning services. This is discussed later on in this report in the section on Designing Learning Activities. SCIC's terms of reference mention the importance of encouraging the use of both official languages, but do not specify the committee's key role in validating the learning content in both official languages. This should be highlighted in SCIC's terms of reference.

The audit found that the commitment to ensure equal quality of learning services in English and French was not specified in the mandate of any of the School's committees or initiatives. The School should consider adding an explicit reference to its official languages obligations—and, more specifically, to the School's official languages obligations regarding services to other federal employees—in order to prevent official languages from slipping under the radar.

STRATEGIC AND OPERATIONAL PLANNING

It was not possible during the audit to see how official languages—and, more specifically, the principle of language equality—were formally and clearly integrated as a consideration in the School's strategic and operational planning. This includes projection exercises, environmental analyses and risk analyses. Interviewees involved in integrated operational planning and strategic direction planning stated that official languages are part of the integrated planning process because offering learning activities in both official languages is an integral part of the School's mandate. However, the audit found few concrete indications on how this was done, and the documentation submitted made no mention of official languages.

Official languages are present in all of the School's activities and are not the sole responsibility of one or just a few specific groups. It is therefore important that they be taken into consideration, especially during projection exercises, environmental analyses and risk analyses, independently of individual commitment.

RECOMMENDATION 1 (CONT.)

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service review its official languages governance structure by:

- d) integrating the principle of official languages equality—and, more specifically, criteria and aspects related to the obligations under section 37 of the *Official Languages Act*—into its strategic and operational planning;

⁹ Only the work of the first subcommittee was included in the scope of this audit.

COMMUNICATING TO EMPLOYEES ABOUT LANGUAGES OBLIGATIONS

At the time of the audit, there were some shortcomings in communications to employees about the School's official languages obligations. The audit found that most staff, including some members of the Official Languages Committee, were not familiar with the *Official Languages Action Plan*. In general, interviewees who were aware of the action plan had not read it in detail. Some interviewees remembered receiving it by e-mail, but said that they had not been able to read it because of their heavy workload, especially during the School's transformation period. The audit also found that the School's intranet site did not promote or provide any information on-line that specifically concerned requirements to serve employees of other federal institutions in the official language of their choice.¹⁰ The School needs to modify its existing governance instruments so that, in addition to the essential references to official languages in terms of internal interaction, they specifically mention and explain the obligations regarding other federal employees under section 37 of the Act. Overall, this shows the importance of proactive communication on official languages that goes beyond e-mails. This will be especially important when the School introduces its updated governance instruments.

RECOMMENDATION 1 (CONT.)

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service review its official languages governance structure by:

- e) communicating its revised governance instruments to all staff promptly and effectively.

UNDERSTANDING NEEDS IN ENGLISH AND FRENCH AND DESIGNING LEARNING ACTIVITIES

UNDERSTANDING LEARNING NEEDS

Discussions with federal institutions on learning needs

The interviews provided an opportunity to survey School staff on the measures that had been taken to understand the learning needs of employees at other federal institutions. The measures and methods varied from region to region (including the National Capital Region) and among the various functional communities. Information on learning needs comes from a variety of sources: high-level interdepartmental committees in charge of policy, the point-of-contact network (EX level) and coordinators of required training, as well as federal councils and federal institutions with regional offices.

During the audit, it was not possible to establish whether learning needs in English and French are systematically included in discussions with representatives of other federal institutions. According to certain interviewees, it is not necessary to discuss these needs, because courses are designed in both official languages. However, as discussed later in this report, the availability of courses in either official language is not always a given, especially in the regions. Each team appeared to be working in a silo when it came to determining whether learning needs in English and French are being met in the different functional communities. Some interviewees did not seem to have given much thought to this issue.

The School needs to hold discussions with federal institutions about the training needs of English- and French-speaking employees. The responsibility to understand learning needs in English and French is one that is shared by the School, which must consistently ask the question, and the federal institutions, which must ensure that they have the tools to understand their employees' learning needs in English and French.

Measuring demand

At the time of the audit, the School was in the process of changing the way it measures demand and determines required resources. The School stated that after the transition to the new funding model, it would develop tools to evaluate demand for learning services in English and French. The School explained that so far, it has had few reliable sources of demographic data in order to determine the

¹⁰ For example, the reminders sent to staff spoke more about interactions between School employees and made only indirect references to "clients."

breakdown of federal employees by official language preference, region and occupational category. The audit found that the School has yet to conduct an analysis that focuses on the availability of courses in English and French in order to determine, for planning purposes, whether there are any disparities between functional communities in terms of effective access to learning activities in English or French. The audit also found that the School understood the importance of taking official languages into account when measuring demand; however, there were some difficulties in terms of available data. The School needs to take the initiative and strive to use all demographic data related to official language preference: from statistics to information from central agencies. For example, an in-depth analysis of data from the federal Public Service Employee Survey on training in the official language of the employee's choice could stimulate discussions with institutions about their employees' learning needs.

Courses in the official language of the majority

At the time of the audit, it seemed that the current perception among interviewees is that federal employees tend to take training courses in the majority language rather than their preferred official language. According to the interviewees who shared this point of view, two of the factors involved in this choice were the work environment and the terminology used in the work environment.

The audit found that the School had not examined this issue to gain a better understanding of it, even though it has a major impact on the learning activities the School offers in both official languages. Choosing to participate in a learning activity in one's second official language is a valid choice and can improve the learner's knowledge of technical and specialized vocabulary in both official languages. It can also help the learner retain his or her second language skills. This kind of individual and informed choice is protected by the Act. However, in practice, it is not always possible to exercise that choice. Data obtained from the School revealed that in certain regions designated as bilingual for language-of-work purposes, as well as in other regions, there were very few or no learning activities in the official language of the linguistic minority. A learner's decision to participate in learning activities in the official language of the majority may be the result of dissatisfaction, inaccessibility of some courses, or even a lack of awareness of his or her rights in this regard. The School needs to use an established methodology to conduct an in-depth study of why federal employees participate in learning activities in their second official language so that it can make a distinction between situations where it is an informed choice (protected by the Act) and those where the choice is due to limitations in the availability of services.

RECOMMENDATION 2

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service put mechanisms in place to measure demand and to take into account federal employees' learning needs in their preferred official language throughout Canada.

DESIGNING LEARNING ACTIVITIES

Designers and the translation process

The audit found that, in general, validating the content of learning activities for equal quality in both official languages during the design stage depends primarily on the designer and on the translation process.

The School has teams of instructional designers who create a significant part of the learning activities for federal employees. At the time of the audit, many designer positions were bilingual with high linguistic profiles (CBC/CBC or CCC/CCC). The courses are created in the language of the designers' choice. According to several interviewees, translation is done at the end of the design process because of tight deadlines and because it is more efficient.

Copy editing and translation by language professionals are strategically important to ensure that the School meets its official languages obligations. Despite a relatively high level of satisfaction with these services among the interviewees, some thought that there had been a decline in resources, that there had been quality issues because of a shortage of translators familiar with the terminology, or that there had been too much learning material to be processed within tight deadlines during the transformation. The Translation Bureau assigns a few editors and translators to the School as part of an agreement. The School would do well to expand the scope of this agreement so that it could benefit from more resources specialized in the terminology used for learning activities.

Once the translation is finished, the designers play a key role in validating any specialized terminology in the other official language. The audit found that the designers are ultimately responsible for a detailed review of the content to ensure equal quality in both official languages. However, differences were observed in the way various teams work on this upstream quality assurance. In some teams, the designer who created the course examines the content in the other official language, and in other teams, a different designer examines the content of his or her colleague. According to the interviewees, there were similarities in several stages of the design of on-line courses and classroom courses (designed in one language, then

edited and translated). The interviews also revealed that the process for creating on-line courses seemed to be more consistent than the one for classroom courses. It should be mentioned that at the time of the audit, one of the teams specialized in designing on-line courses and provided support to the other design teams.

Several instructional designers on various teams were former language teachers, which makes them more sensitive to the importance of language quality. However, because of the normal course of organizational renewal, there is no guarantee that this level of expertise will be maintained in future. It is therefore important to formalize the quality assurance process to ensure equal quality of content in both official languages during the design stage.

Considering the needs of both official language groups

The audit found that the needs of both official language groups had been taken into account during the design stage and that content and expertise from both groups had been used. However, it was difficult to determine whether all designers had received support regarding these issues. Some were satisfied with the fact that the documents are edited and translated and that the content is reviewed by SCIC (see section on SCIC review, below). It is important that the quality assurance mechanisms and procedures take the needs and expertise of both official language groups into full consideration. The School would also benefit from developing training for its new designers on equal quality of official languages and on appropriate information sources in both official languages.

Guide for instructional designers

In 2015–2016, the Official Languages Committee developed a best practices guide for its staff called the *Guide to Official Languages Best Practices for Instructional Designers*. An official languages job aid was also made available to School staff in the fall of 2016. The Interim Commissioner of Official Languages commends the School on its initiative in creating the guide, which provides clear descriptions of official languages requirements in the context of the work of the designers, whose work is a crucial part of the School's capacity to meet its language obligations. She encourages the School to share the guide with other federal institutions that provide learning activities to their staff so that they can benefit from these official languages best practices.

Unfortunately, most of the School's instructional designers were not aware of the Committee's guide at the time of the audit. With few exceptions, the only interviewees who mentioned the guide were the ones who worked on it. The guide had been distributed by

e-mail to employees and made available on-line along with other tools for instructional designers. The School needs to take more active measures (mention the guide during key meetings or hand out hard copies) in addition to the passive ones (e-mail and intranet) in order to raise awareness about this high-quality tool that has been developed in-house. This issue is similar to the one related to communication mentioned in the previous section on Governance Structure. That said, the guide and the official languages job aid are not considered to be official procedures, directives or instructions.

External learning content, references and copyright

The audit found that many interviewees had problems using external content and references in learning activities. At the time of the audit, the School did not have a commonly accepted definition for "equivalent content" in English and French for this type of external content, such as e-books made available to learners or videos used to supplement the course material. These resources are rarely available in both official languages, and those that are available are rarely of equal quality in English and French. For on-line courses, some units seem to have taken a "one for one" approach as a precautionary measure. With regard to references, this means that each reference must be available in both official languages; otherwise it is not used. Other interviewees noted that traditional library services do not necessarily work this way and do not think that this rule is necessary. Many resources are available only in English and others only in French.

In essence, it is acceptable to require that content from external sources be equivalent, but the School needs to define the meaning of "equivalent" and give its employees the tools they need to understand the parameters involved. Unless the references are identical in English and French, equal quality must be ensured by having references that enable learners to achieve the same educational goals in both official languages.

The question of copyright is also at issue. At the time of the audit, the School did not have any exemptions to certain provisions of copyright law, which are usually made available to educational institutions and research facilities. Therefore, designers or instructors who wish to use external content in learning products, including any translations thereof, must obtain permission from the copyright owner. The School is encouraged to conduct an in-depth review of the copyright issue in order to determine the impact of the current situation on the School's ability to use learning content of equal quality in both official languages.

Pilot courses

During the process of designing learning activities (in class or on-line), design teams test the content on a focus group of experts. The objective of this exercise is to ensure that learning objectives are met and to make any adjustments before the course is launched. After the Office of the Commissioner of Official Languages investigated a complaint in 2015, the School changed its position—which was to deliver the pilot courses in the designer's preferred official language—and now requires all pilot courses to be given in both official languages. The School's senior management sent an e-mail to staff in February 2016 to inform them of the decision.

At the time of the audit, only some of the teams had had the opportunity to deliver pilot courses in both official languages, but most of the staff were aware of the School's new position. However, discussions with interviewees during the audit showed that people's perceptions of the new position, whether positive or negative, varied from one individual to the next, which could affect consistent application. For example, some interviewees said that a pilot course could be given in French at a different stage of the design process than the pilot course in English, even though the School is required to communicate equally with both official language groups. The School therefore needs to provide a clear explanation of its new position.

Some interviewees also said that the School's new position had made tight design deadlines more problematic. Major changes are often made at the end of a pilot course, which then results in additional editing and translation.

The School has an institutional responsibility to make resources available so that teams can design and deliver pilot courses in both official languages. The School's new position on pilot courses must be included in governance instruments so that it continues to be applied in the future. At the time of the audit, the requirement for pilot courses to be in both official languages was mentioned only in the official languages job aid. As stated above, this is not considered to be a formal procedure.

Having pilot courses in both official languages and using focus groups that reflect regional, ethnocultural and gender diversity, as well as a variety of expertise from both language communities can only enrich the School's design process, even if it inevitably requires more resources than previously, when pilot courses were given in only one language.

SCIC review

SCIC plays a key role in validating learning activities at the design stage. An analysis of the School's documentation clearly showed that the committee was taking official languages into account at the time of the audit. The Interim Commissioner of Official Languages would like to highlight the fact that SCIC's high-level review included questions on official languages, which is a best practice.

Launching learning activities

The launch of a learning activity is the finish line in the design process. Interviewees who shared their opinions about the availability of on-line or classroom courses in both official languages all said that a course is not launched if the material is not finalized and available in both official languages. This requirement was not found in the governance instruments, however. It is therefore suggested that the School address this situation.

CONTENT ACQUISITION

Some learning content, particularly non-interactive learning content available on-line, is purchased from external suppliers following a call for tenders. Based on feedback from learners in 2016, the School found that there were significant shortcomings in the quality of the French content in on-line courses that it had purchased from a third party and made available to learners in English and in French on its GCcampus platform. At the time of the audit, the School had withdrawn the content in both languages and was still in the process of correcting it. During the audit, the School confirmed that it had not verified course content in the past from external suppliers to ensure that the quality was equivalent in both languages. It had assumed that the companies submitting bids guaranteed quality, which led to a situation of non-compliance with the Act. The School took the necessary measures to rectify the situation itself. To avoid this type of situation in future, all content—including that which is developed internally as well as content purchased from external suppliers—must go through a quality assurance process in both official languages, and any necessary corrections must be made before the content is made available to learners.

RECOMMENDATION 3

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service put formal mechanisms in place to validate language quality and ensure equivalence in both official languages of all on-line content before making it available to learners.

PROMOTION AND AVAILABILITY OF LEARNING ACTIVITIES OF EQUAL QUALITY IN ENGLISH AND FRENCH

PROMOTION OF LEARNING ACTIVITIES IN ENGLISH AND FRENCH

The communications team is responsible for promoting learning activities to other federal institutions. At the time of the audit, it was doing this by sending out promotional e-mails in both official languages and by producing short promotional videos for learning activities. Most interviewees stated that all mass communications sent in writing to federal institutions were in both official languages. In the regions, promotional e-mails were also always sent in English and French. Some interviewees, however, stated that this was not always the case. It should be noted that the communications team has its own writing and translation resources in both official languages.

In some regions, promotional communications often stated at the outset that the course or event would be offered in only one official language. This could discourage participation in the other official language. The issue of learning activities being available in both official languages is discussed later in this report. With the exception of this aspect, the audit did not find anything that was of concern or that required specific action with regard to promoting learning activities in English and French. Current promotional practices should be maintained.

COMMUNICATIONS BETWEEN SCHOOL STAFF AND OTHER FEDERAL EMPLOYEES

Customer service

In 2016, the School contracted Service Canada to handle initial telephone contact with its learning services clients. School employees are still responsible for responding to more complex questions. Because this was a completely new practice at the time of the audit and because this service was contracted to a federal institution subject to the Act, the audit did not examine it for compliance with the Act.

With respect to School employees, at the time of the audit there was a team responsible for liaising between federal institutions' points of contact and the required training coordinators. Regional staff played a complementary role in this regard. Interviewees stated that they knew the rules for communication in the preferred official language of employees of other federal institutions. However, these rules were not set out in any of the School's governance instruments.

Courses on active offer, on providing bilingual services and on language-of-work rights were included in the learning path the School recommended to its employees. However, during the audit it was not possible to establish whether the School had ensured that training on service to other federal employees in their preferred official language had been provided to each staff member in each region. Moreover, the audit did not turn up any documents that provided School staff with a clear explanation of their obligation to serve clients from federal institutions in the official language of their choice across the country. The School did produce a self-evaluation tool for language of work that was intended for all federal institutions; however, at the time of the audit, the tool did not differentiate between the obligations under section 37 of the Act and obligations for institutions that are not subject to section 37 requirements. The School needs to adapt this tool for its own staff and for employees of other federal institutions subject to section 37.

Regarding the capacity to serve learners in their preferred official language, the School had bilingual positions with BBB/BBB or CBC/CBC linguistic profiles in all regions. In addition, all regions outside of Quebec and Nunavut had at least one bilingual position with a CCC/CCC linguistic profile. However, it should be noted that at the time of the audit, several positions were vacant and some incumbents were on secondment; therefore, there was no clear indication that bilingual capacity was maintained at all times. Some interviewees stated that they were aware of situations in the regions where the current language skills of some School employees no longer corresponded to the results they had obtained during their second language evaluation several years earlier. These interviewees would like the School to be more proactive in helping its employees to maintain their second official language skills, especially in regions where the demand for services in French is lower.

Furthermore, because the Québec City office—which, at the time of the audit, had positions identified as “French essential”—also serves the Nunavut region, the School is encouraged to ensure that the linguistic profiles of these positions correspond to the actual duties of providing customer service to other federal employees in the region.

AVAILABILITY OF LEARNING ACTIVITIES OF EQUAL QUALITY IN ENGLISH AND FRENCH

Availability of classroom courses

At the time of the audit, there were some key differences between the availability of classroom courses in the National Capital Region and in other regions. Differences were also noted between key individual courses and transition programs involving cohorts.

During the audit, interviewees in charge of individual courses said that in the National Capital Region, the current practice was to list the courses in both official languages on the GCcampus schedule for longer periods of time than was the case previously. At least one offering of any course was always posted on the schedule in both official languages. Actual availability depends on enrolment. In addition, interviewees said that because courses are free of charge to the learners under the new business model, the School is less dependent on the budget cycle of federal institutions.

The School said that it had added a learning request function to GCcampus that allows learners to enter details on where, when and in what official language they wish to take a given learning activity. According to the School, this function allows it to better plan for demand in both official languages when classroom courses are not available at a particular time.

At the time of the audit, accountability for planning courses in the regions—both individual and for cohorts—was left to the regional directors. Their teams were supported by the Capacity Planning Team at the national level, but they also used their own knowledge of regional realities to create course and event offerings. At the time of the interviews, the practices related to offering learning activities in both official languages varied widely from region to region and depended on the personal commitment of whoever was responsible for the activity.

Generally speaking, at the time of the audit, the School was not systematically scheduling every course in English and French in every region, which seemed to contradict the general guidelines provided by senior management. Some regions—specifically, Toronto and Québec City—did not offer any learning activities in the official language of the minority, despite the presence of a significant minority population. There was no availability or measurement of demand for learning activities in the minority language in either region (French in Toronto and English in Québec City). Interviewees stated that sometimes learning activities offered in the minority language were geared to the demographic weight of the linguistic minority in that region. This is a misinterpretation of the Act because section 37 guarantees an individual right that goes beyond regions designated as bilingual for language-of-work purposes. Leadership program courses in French were concentrated in Montréal and Québec City, with a few others in Moncton.

The audit found that there were no defined criteria across the country for cancelling courses with insufficient enrolment. The School needs to adopt cancellation standards that systematically take into account the specific circumstances of the various regions and language communities. The interviews revealed that, in cases where specific learning activities were unavailable in the official language of the minority, the School rarely offered alternative solutions that took into account the travel costs that had to be paid by the learners and their federal institutions.

RECOMMENDATION 4

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service adopt standards that are clearly defined for each region by:

- a) scheduling learning activities (courses, events, etc.) in both official languages;
- b) establishing criteria for cancelling activities when there is insufficient enrolment and proactively offering alternatives;

At the time of the audit, there were still some major challenges regarding the availability of learning activities in English and French in the various regions, despite some of the measures the School had taken. However, because teaching resources are centralized, all interviewees in the regions said that if there was sufficient demand for a particular course, they would certainly be able to organize it, either locally or by calling on teaching staff in the National Capital Region. As previously mentioned, the learning material is already available in both official languages and the School has bilingual capacity in terms of instructors.

Some interviewees in the regions said that the federal councils were being used to promote learning activities. Interdepartmental committees and federal councils play an important role in promoting the School's curriculum in both official languages and in encouraging participation in courses or at specific events in the language of the minority.

According to the interviewees, inter-regional virtual events would be an appealing and innovative solution when enrolment numbers are not high enough for a course or event to be offered in person in the official language of the minority. The learning experience should not, however, be diminished in either official language.

In all cases, the key is to find a way to improve capacity planning for learning activities in both official languages in the National Capital Region and in every other region by using both demographic data and exchanges with institutions.

The audit found that some classroom courses and webcasts of leadership programs were offered bilingually (i.e., learners participate in the official language of their choice), especially for senior management. According to the School, bilingual learning activities for senior management are essential for integrating official languages into the culture of federal executives. However, aside from the pedagogical objectives that may be involved, the School needs to keep in mind that section 37 gives learners an individual right, regardless of their level or the linguistic identification of their position. Some interviewees said that courses for several cohorts enrolled in leadership programs were bilingual expressly because senior management positions must have a linguistic profile of CBC/CBC or higher. This interpretation is not in the spirit of the Act.

Availability of local and national events in English and French

Events are an increasingly popular method of delivering learning activities. The School now organizes hundreds of them every year. National events, which are webcast, have been delivered with simultaneous interpretation since 2016, regardless of where the event takes place. The School also presents hundreds of local learning events on specific topics across the country.

At the time of the audit, the School had no formal written procedures that defined the circumstances or conditions under which events must have simultaneous interpretation, those under which events must have bilingual masters of ceremonies or speakers, and those under which events can be presented in only one official language. In short, there is no formal procedure for holding regional events in the official language of the minority. The School must therefore formalize its recent decision regarding simultaneous interpretation for webcast events, an improvement that needs to be established as a standard.

RECOMMENDATION 4 (CONT.)

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service adopt standards that are clearly defined for each region by:

- c) establishing a requirement to deliver events in both official languages when webcast or, for local events, when enrolment permits.

On-line courses and videos

Nearly all of the interviewees said that every non-interactive on-line course was available in English and French. According to a number of interviewees, changing several classroom courses to self-paced

on-line courses (including several required training courses) has had a very positive effect for federal employees from the official language minority because it resolves the issue of accessibility. Interviewees also said that the videos developed for learning activities were always available in English and French. Several interviewees expressed the concern that it is important to ensure not only that videos are bilingual, but also that they reflect both language communities (e.g., by producing videos using English- and French-speaking specialists and by avoiding the use of subtitles). Discussions with interviewees involved in creating videos revealed that one of the School's priorities is making sure that learning products are accessible for people with functional limitations or disabilities. These aspects of the audit did not raise any concerns.

New approaches to participatory learning

The audit found that the School was just starting to introduce new approaches to on-line participation in its learning activities and that it had not yet made the switch to participatory production, which was thought to be inevitable by several interviewees. However, participatory approaches to on-line learning were being used more and more in the School's learning activities. According to the interviewees, on-line participatory activities took place in the language of the learning activity (e.g., a discussion forum related to a given course). When asked about learning activities using WebEX videoconferencing software, interviewees said that the practice was for discussions to take place in only one official language because testing the bilingual format of WebEX did not produce conclusive results. The School had no formal directives on this issue.

Several interviewees mentioned challenges related to discussion forums and blogs. During the audit, it was noted that there were no requirements or guidelines to ensure that on-line discussions were equivalent in both official languages. Interviewees had varying opinions on how to address this issue. Some felt that it did not make sense to separate English- and French-speaking learners into different threads, while others felt that separate environments would make learners more comfortable in taking full part in their preferred official language. Therefore, at the time of the audit, the School was still exploring official languages in the context of new collaborative methods. Some interviewees said that the School would very likely follow the current practices for GCconnex and GCpedia, which are platforms managed by the Treasury Board of Canada Secretariat. The School needs to take the initiative, however, and give its employees the tools they need to ensure that the spirit of the Act (i.e., substantive equality between both language communities) is respected when the letter of the law is not clear on the issue.

If learning activities are of equal quality in both official languages from the outset and course offerings are the same, then they can take place entirely in one language rather than switching between English and French. It is difficult to manage discussions in order to ensure that they are identical in both languages in real time. Equal quality does not necessarily mean identical. In all cases, activities in which participants can use English and French at the same time appear to be problematic: it is difficult to set parameters for them, and the balance between English and French can easily shift in favour of one or the other. The practices that the School has put in place seem to reflect this and should therefore be maintained, with the exception of certain learning activities for senior management that pose a compliance issue, as mentioned above.

QUALITY ASSURANCE AND EVALUATION

POST-LEARNING QUALITY ASSURANCE

At the time of the audit, the School had no downstream quality assurance mechanism, which means that the content of the courses or events was not checked for equal quality in English and French beyond the design stage. Course materials and the delivery of learning activities were not assessed after the fact to make sure they were equal in quality in both official languages. This type of assessment would involve taking a sample of courses or even all of the learning activities and evaluating the quality of the English and French versions based on criteria established in consultation with the various divisions of the Learning Programs Branch and approved by senior management. Ultimately, this would help to identify any design adjustments required and improve the entire process. The goal is for the results of the assessments to be brought to the attention of senior management periodically.

RECOMMENDATION 5

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service:

- a) set up an official languages quality assurance function to evaluate the accessibility of learning activities after they have been delivered and to determine whether the quality of learning material was equal in both official languages;

COURSE EVALUATIONS BY LEARNERS

At the end of every event and classroom learning activity, level 1 evaluations are handed out to the learners. At the time of the audit, course/event evaluations did not include questions about whether learners were able to participate in the learning activity in their preferred official language or whether they had received service

from School staff in the official language of their choice. Several interviewees said that learners could use the comments section in the level 1 form to raise any concerns related to official languages if they wished. However, this section is not reserved specifically for official languages, which means that learners' comments on their official languages experience are not systematically solicited. Analyzing the data from the learners' evaluations is also an important issue. During the audit, it was not possible to show that there was any data on official languages from any analysis that had been conducted, beyond specific follow-up on questions raised by learners about a particular course.

RECOMMENDATION 5 (CONT.)

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service:

- b) introduce course evaluations that survey learners to find out whether they were able to take the course in the official language of their choice and whether they received services from the School in the official language of their choice (and if not, why not);

COMPLAINTS AND FEEDBACK ABOUT OFFICIAL LANGUAGES

At the time of the audit, federal employees had several channels—in addition to course evaluations—through which they could provide feedback on service in their preferred official language: the School's website, its regional staff and its Client Contact Centre, as well as their institution's learning coordinator and the Office of the Commissioner (by filing a complaint). Depending on the channel, feedback was processed in different ways and through different officials with no overall coordination. For example, if a learner filed a complaint through the Office of the Commissioner, it was handled by the School's human resources team. If the learner raised the same concern with the School's regional staff, it was handled by the branch responsible for the regions. If the learner went through the School's website or Client Contact Centre, the feedback was processed in another way. Establishing a transparent and integrated procedure to address any official languages compliance issues, regardless of how they were communicated, would help provide an overall view to senior management, in particular.

RECOMMENDATION 5 (CONT.)

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service:

- c) put a transparent and integrated mechanism in place to resolve official languages compliance issues raised by learners;

EVALUATION, AUDIT AND ACCOUNTABILITY

Because it is a small federal institution, the School does not conduct its own internal audits, which is in accordance with the Treasury Board's internal audit policy instruments. However, the present audit did not find any evidence of how the School's internal audits were coordinated to ensure that their objectives and criteria included or reflected official languages. At the time of the audit, the School was conducting only one program evaluation, but it was critically important because it was about the School's strategic directions. The formative evaluation had been completed at the time of the audit, and the summative evaluation was in progress. Official languages were not taken into account in the evaluation's objectives or in the issues that were evaluated, even when it talked about equitable access to learning. It was not possible during the audit to show that the evaluation team reported to senior management specifically on official languages.

Nevertheless, the School's *Integrated Plan* took official languages into account in its objectives and deliverables, which is a good practice. However, during the audit it was not possible to prove, in concrete terms, that official languages were an integral part of accountability (e.g., reporting on the percentage of activities that were available and of equal quality in both official languages).

RECOMMENDATION 5 (CONT.)

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service:

- d) integrate the principle of official languages equality into each of its downstream departmental activities, including internal audits, program evaluations, and senior management and central agency accountability;

OFFICIAL LANGUAGES AND PERFORMANCE EVALUATIONS

The Treasury Board's *Policy on Official Languages* stipulates that federal institutions for which the Treasury Board is an employer must ensure that "compliance with this policy and associated directives and standards is included in annual performance appraisals and influences appraisal ratings."¹¹

At the time of the audit, performance evaluations for senior management contained a standard statement about the implementation of the School's *Official Languages Action Plan 2014–2016*. This statement focused exclusively on language of work within the organization and did not include the obligations under section 37 of the Act. The School therefore needs to ensure that any wording related to official languages in performance evaluations for senior officials include compliance with the obligation to provide federal employees with services and learning activities of equal quality in both official languages. The audit did not find any specific consequences of failing to meet these objectives, besides the fact that they were left to the discretion of the responsible manager.

For School employees who are not senior executives, official languages were not, at the time of the audit, specifically mentioned in the departmental objectives with which individual performance objectives are aligned. Few interviewees had elements related to official languages in their performance objectives. In cases where employees had such objectives, it seemed they were mostly related to their personal commitment or to their supervisor's personal commitment rather than to a departmental approach. There was no consistent approach to ensure, for example, that designers are evaluated on developing products of equal quality in both official languages or that employees in charge of contracts are systematically including language clauses in contracts and conducting appropriate follow-up. People who work with other federal institutions, however, had official languages-related objectives that were all based on client service excellence.

RECOMMENDATION 5 (CONT.)

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service:

- e) ensure that performance objectives related to section 37 of the *Official Languages Act* are included in the performance evaluation process every year for all employees (executives and non-executives) and are appropriate to the nature and scope of their duties.

¹¹ Treasury Board of Canada, *Policy on Official Languages*, Ottawa, 2012. On-line version (www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=26160) accessed October 12, 2017.

CONCLUSION

On the whole, the audit was positive. This outcome might have been quite different if the audit had been conducted under the previous business model, before the beginning of the School's transformation in 2014–2015. In 2015–2016, the School took measures to correct official languages shortcomings that had previously been identified, including:

- requiring pilot courses to be delivered in both official languages;
- using simultaneous interpretation for webcast events;
- establishing new planning cycles for classroom courses; and
- identifying the need for a course in English or French using the learning request option on GCcampus.

To ensure success, the School must integrate these measures into a more structured approach and include them in its governance instruments.

The audit found that School staff had a positive attitude toward official languages. However, the School's specific obligations to federal employees were not always fully understood, nor were they included in the School's governance instruments. At the time of the audit, the School was not taking the necessary measures in certain regions in order to meet the needs of learners who speak the official language of the minority. There was also a misconception shared by several interviewees that the School's bilingual services were limited to regions designated as bilingual for language-of-work purposes. If the School does not change the way it plans and offers its in-person learning activities, it could be denying federal employees the opportunity to take courses in their preferred official language, which in turn could risk infringing Part VI of the Act, in that a lack of training in a learner's preferred official language could have an impact on career advancement.

Section 37 of the Act guarantees an individual right to federal employees. The School must stay focused on respecting individual choice in its course offerings and ensure that its learning activities, regardless of whether they were purchased or developed internally, are always of equal quality in both official languages, which does not necessarily mean that they are identical in all respects. There

are also innovative ways to integrate linguistic duality in learning activities, such as proactively making course materials available to learners in both official languages. The audit found that if there is enough demand for a learning activity in either official language, the School has the capacity and the resources to organize and deliver it across Canada. The key issue is really demand in the official language of the minority, and the School must proactively cultivate this demand in order to break the vicious circle whereby there is no supply because there is no demand, and there is no demand because there is no supply or promotion.

Ultimately, the Canada School of Public Service needs to go beyond oral tradition by ensuring that it has the training tools, rules and resources to fully support its employees in terms of equal quality in both official languages for its learning activities as well as for services and communications provided to federal employees.

The Interim Commissioner of Official Languages has made five recommendations, which are listed in Appendix B. She is satisfied with the measures and timelines proposed in the School's action plan regarding the implementation of the five recommendations. Appendix B also contains the School's comments and action plan for each recommendation, as well as the Interim Commissioner's comments. Within 18 to 24 months after the publication of the final audit report, the Office of the Commissioner will follow up on whether the School has implemented the recommendations.

The Interim Commissioner believes that implementing the five recommendations in this audit report will help the School to strengthen its role as a leader among the federal institutions by setting an example and consolidating its expertise in official languages, which it can then share with others. It will also help the School to improve its compliance with the Act and to address any compliance-related challenges more promptly and effectively.

APPENDIX A

AUDIT OBJECTIVES AND CRITERIA

OBJECTIVES	CRITERIA
<p>1) The Canada School of Public Service takes into account its obligations under section 37 of the <i>Official Languages Act</i> when planning the learning activities it provides to federal employees.</p>	<p>a) The School has a structure in place that takes its language-of-work obligations into account when planning its learning activities. This structure may include an official languages action plan, an official languages accountability framework and official languages policies, directives or procedures.</p> <p>b) The School has taken effective measures to understand the training needs of federal employees in either official language across all regions and takes these needs into account when planning its range of learning activities.</p> <p>c) The School has taken effective measures to ensure that any process for seeking contributions to and feedback on its curriculum from federal employees takes into account both the language of work of the employees invited to participate and the School's duty to treat both official language communities equally.</p>
<p>2) The availability, promotion and delivery of learning activities to federal employees by the School are of equal quality in both official languages.</p>	<p>a) Information related to the schedule of learning activities in either official language is made available to federal employees in both official languages at the same time.</p> <p>b) The availability and promotion of learning activities offered by the School are of equal quality in both official languages.</p> <p>c) Federal employees across Canada in a wide range of occupational categories can enroll in a variety of activities, both on-line or in person, in a timely manner in both official languages.</p>
<p>3) The School monitors and manages the quality of the availability, promotion and delivery of learning activities to federal employees in both official languages.</p>	<p>a) The School has a formal monitoring mechanism in place to determine whether learning activities are available and delivered in the preferred official language of federal employees across Canada in a wide range of occupational categories.</p> <p>b) The results of the monitoring are used to promote continuous improvement of learning activities offered in both official languages to federal employees in all occupational categories.</p>

APPENDIX B

RECOMMENDATIONS, THE CANADA SCHOOL OF PUBLIC SERVICE'S COMMENTS AND ACTION PLAN, AND THE INTERIM COMMISSIONER OF OFFICIAL LANGUAGES' COMMENTS

Note regarding the term “Ongoing” in the “Expected completion date” column:

In discussions with School officials following the submission of the action plan, it was confirmed that “ongoing” means that the work has started, but that it did not seem advisable to specify a deadline, either because it was difficult to determine or because the work is a continuous activity. The Interim Commissioner expects that, in light of the School’s commitment, the audit follow-up will be able to show that:

- *the work has been completed for actions whose deadlines were difficult to determine; and*
- *the work is continuing systematically for ongoing activities.*

The audit follow-up will begin within 18 to 24 months after the publication of the final audit report.

RECOMMENDATION 1

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service review its official languages governance structure by:

- a) revising existing framework documents and developing new ones, including an official languages accountability framework describing the responsibilities of every level, so that its obligations under section 37 of the *Official Languages Act* are taken into account;

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
The Canada School of Public Service (CSPS) will revise the existing Official Languages (OL) Action Plan 2017-19.	Learning Programs Branch and Corporate Services Branch	September 2017
CSPS will develop an OL accountability framework that sets out the School’s own strategy to meet its obligations under the Act and under Treasury Board’s OL policy instruments.	Learning Programs Branch and Corporate Services Branch	March 2018
CSPS will ensure that the terms of reference for senior governance committees within the School clearly set out OL responsibilities so that obligations under section 37 of the Act are taken into account.	Governance Secretariat	January 2018

- b) ensuring that anyone acting as the Official Languages Champion has the means and time necessary to carry out the duties associated with that role, and that his or her performance objectives reflect those responsibilities;

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will ensure that the OL Champions have the means and time necessary to carry out their duties, and that their performance objectives reflect their responsibilities. Champions will report every quarter to the Executive Committee.	Deputy Minister and Governance Secretariat	October 2017

- c) ensuring that senior management discusses the School's language obligations regularly and that anyone acting as the Official Languages Champion can participate in the discussions;

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will ensure that senior management discusses the School's languages obligations every quarter by making OL a standing item on the agenda of the various Management teams' agendas.	Governance Secretariat	September 2017

Interim Commissioner's comments:

It is important to ensure that anyone acting as the Official Languages Champion participates in every discussion with senior management on official languages, regardless of whether the Champion is a standing member of the senior management team. Following discussions with School officials after the submission of the action plan, it appears that this is the spirit of the measure described above.

- d) integrating the principle of official languages equality—and, more specifically, criteria and aspects related to the obligations under section 37 of the *Official Languages Act*—into its strategic and operational planning;

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will integrate an OL objective (including section 37) into future integrated plans for the School.	Corporate Services Branch	April 2018

- e) communicating its revised governance instruments to all staff promptly and effectively.

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will actively communicate to staff updates to OL governance instruments such as the OL Action Plan, policy and guidelines.	Learning Programs Branch and Corporate Services Branch	Ongoing
CSPS will update intranet page resources and content, including the new <i>Official Languages Guide for Employees</i> , to explain the obligations regarding other federal employees under section 37 of the Act.	Learning Programs Branch and Corporate Services Branch	Ongoing
CSPS will conduct a workshop to raise awareness and showcase best practices and tools.	Learning Programs Branch and Corporate Services Branch	March 2018

Interim Commissioner's comments:

I am satisfied with the measures the School has proposed to address Recommendation 1.

RECOMMENDATION 2

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service put mechanisms in place to measure demand and to take into account federal employees' learning needs in their preferred official language throughout Canada.

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will take a more rigorous approach for demand management by strengthening its existing process and practices to ensure that the learning needs of federal employees are taken into account and met in their preferred official language.	Learning Programs Branch	Ongoing
CSPS will continue to analyze (quarterly) the offer, availability and take-up of learning activities in regions in both OL.	Learning Programs Branch	Ongoing
CSPS will ensure that learning needs in English and French are systematically included in discussions with representatives of other federal institutions through: <ul style="list-style-type: none">• CSPS Advisory Committee• CSPS Advisory Sub-Committee• Enterprise Editorial Board• Points-of-contact meetings	Learning Programs Branch	Ongoing

Interim Commissioner's comments:

I am satisfied with the measures the School has proposed to address Recommendation 2. Although the wording of the first measure may seem vague, the relevance of all three measures proposed in response to this recommendation was demonstrated both in the information collection phase of the audit and in discussions with School officials following the submission of the action plan.

RECOMMENDATION 3

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service put formal mechanisms in place to validate language quality and ensure equivalence in both official languages of all on-line content before making it available to learners.

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS, as part of its Learning Content Development Process (LCDP), will institute a mandatory OL review of all School-developed products prior to publishing any content to GCcampus.	Learning Programs Branch	January 2018
In addition to the current compliance check on OL, sign-off on quality control will become an integrated part of the School's LCDP, and will take place before learning products are made available.	Learning Programs Branch	January 2018
With the consolidation of editorial services, new and redesigned learning activities will be reviewed for language quality as part of the School's LCDP to formalize and standardize the quality assurance of products.	Learning Programs Branch	January 2018
As part of the LCDP, CSPS will embed/update/develop OL processes, its Learning Product Application and checklists to support School employees and contracted online suppliers in ensuring OL compliance.	Learning Programs Branch	June 2018
CSPS will train its course designers on equal quality of OL and will update, promote and share its <i>Guide to Official Languages Best Practices for Instructional Designers</i> and its OL job aid.	Learning Programs Branch	June 2018
CSPS will review the criteria concerning language quality and language equivalence that will be included in all calls-for-tenders for all third party suppliers of online courses. Vendors will be required to certify language quality prior to contract award. Regular verification will be carried out by the School to ensure compliance by third-party course providers and provide regular feedback thereafter.	Learning Programs Branch	June 2018

Interim Commissioner's comments:

I am satisfied with the measures the School has proposed to address Recommendation 3.

RECOMMENDATION 4

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service adopt standards that are clearly defined for each region by:

a) scheduling learning activities (courses, events, etc.) in both official languages;

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS, with the implementation of the Operations Management System in 2017, will increase efficiency at a planning level. It will minimize risk, ensuring access in both OL by providing a real-time view of the demand and by increasing the reaction time to add new offerings in the system.	Learning Programs Branch	June 2018
CSPS will analyze the offer, availability and take-up of learning activities in all regions, as well as develop practices to ensure greater access to learning activities, in both OL.	Learning Programs Branch	June 2018

b) establishing criteria for cancelling activities when there is insufficient enrolment and proactively offering alternatives;

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will create new OL guidelines for live offerings (scheduling and cancellation) and ensure consistent application in regions.	Learning Programs Branch	June 2018

Interim Commissioner's comments:

It was confirmed in discussions with School officials following the submission of the action plan that although the guidelines will also cover the proactive offer of alternatives when necessary, new procedures will help to ensure that regional staff have first done their due diligence from an official languages standpoint before cancelling a learning activity.

c) establishing a requirement to deliver events in both official languages when webcast or, for local events, when enrolment permits.

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will define standards and guidelines that set out which events must have simultaneous interpretation for all webcasts or WebEx events.	Learning Programs Branch	Fall 2017
CSPS will develop a checklist and best practices guide to deliver events in both OL for webcasts and local events when enrolment permits.	Learning Programs Branch	June 2018

Interim Commissioner's comments:

I am satisfied with the measures the School has proposed to address Recommendation 4.

RECOMMENDATION 5

The Interim Commissioner of Official Languages recommends that the Canada School of Public Service:

- a) set up an official languages quality assurance function to evaluate the accessibility of learning activities after they have been delivered and to determine whether the quality of learning material was equal in both official languages;

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will ensure that quality assurance accountabilities and roles are clearly defined and that language quality is reviewed on a continuous basis. The Learning Programs Branch will work with the School's Planning and Results unit to ensure that accessibility and quality are measured and reported on regularly through internal reviews. They will also ensure ongoing data gathering from learners.	Learning Programs Branch	December 2018

- b) introduce course evaluations that survey learners to find out whether they were able to take the course in the official language of their choice and whether they received services from the School in the official language of their choice (and if not, why not);

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will add a question to the participants' course evaluation form asking if they signed up for the course in their preferred official language and if not, then why.	Corporate Services Branch	June 2018

Interim Commissioner's comments:

It was confirmed in discussions with School officials following the submission of the action plan, that the School is also exploring alternative solutions to measure learners' satisfaction regarding the quality of learning services in their preferred official language.

- c) put a transparent and integrated mechanism in place to resolve official languages compliance issues raised by learners;

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will review its client service strategy and complaints resolution processes to ensure that an integrated mechanism is in place to resolve learner complaints related to OL.	Learning Programs Branch and Corporate Services Branch	June 2018

- d) integrate the principle of official languages equality into each of its downstream departmental activities, including internal audits, program evaluations, and senior management and central agency accountability;

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will ensure that OL are an integral part of accountability by reporting on the percentage of activities that are available and of equal quality in both OL.	Learning Programs Branch	Ongoing
CSPS will add wording related to OL in the program evaluations.	Corporate Services Branch	April 2018

Interim Commissioner's comments:

With respect to the wording related to official languages in program evaluations, the principle of official languages equality must be integrated into the evaluation exercise itself: for example, by making it part of an evaluation criterion.

e) ensure that performance objectives related to section 37 of the *Official Languages Act* are included in the performance evaluation process every year for all employees (executives and non-executives) and are appropriate to the nature and scope of their duties.

<i>CSPS action plan</i>	<i>Area responsible</i>	<i>Expected completion date</i>
CSPS will ensure that executives hold discussions on section 37 of the Act linked to the obligation to provide federal employees with services and learning activities of equal quality in both OL throughout the performance evaluation process in a manner appropriate to the nature and scope of their duties.	Corporate Services Branch	October 2017
CSPS will ensure that the subject of OL is discussed as part of the performance evaluation process for all employees in a manner appropriate to the nature and scope of their duties.	Corporate Services Branch	October 2017

Interim Commissioner's comments:

I am satisfied with the measures the School has proposed to address Recommendation 5.

