



Office of the
Commissioner of
Official Languages

Commissariat
aux langues
officielles

AUDIT

OF BILINGUAL SERVICES TO THE TRAVELLING
PUBLIC PROVIDED BY THE CANADIAN AIR
TRANSPORT SECURITY AUTHORITY

FOLLOW-UP

July 2020



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TABLE OF CONTENTS

CONTEXT	1
METHODOLOGY	1
ANALYSIS	2
CONCLUSIONS	18

Context

In March 2017, the Office of the Commissioner of Official Languages (the Office of the Commissioner) published its audit report on the bilingual services to the travelling public provided by the Canadian Air Transport Security Authority (CATSA). Although the audit was conducted mainly at CATSA headquarters, it also included visits to the four major regions (East, Central, Prairies and Pacific) and six major airports.¹ Following this audit, the Interim Commissioner of Official Languages made 15 recommendations to help CATSA improve the experience of travellers who want to obtain services in the official language of their choice, in accordance with Part IV of the *Official Languages Act* (the Act). The audit report, along with CATSA's comments and action plan in response to the audit, are available on the Office of the Commissioner's website.

The 15 recommendations made by the Interim Commissioner of Official Languages focused on the following four objectives:

- Ensure that CATSA senior management has committed to implementing Part IV of the *Official Languages Act* in order to guarantee that passengers can be served in the official language of their choice.
- Ensure that CATSA has a formal mechanism to make an active offer and provide services of equal quality in English and French during all steps of the airport security screening process.
- Ensure that CATSA understands the needs of official language minority communities and takes them into account when planning its bilingual services.
- Ensure that CATSA effectively monitors the delivery of services of equal quality in English and French by third-party service providers in airports.

Methodology

In December 2018, the Commissioner of Official Languages began the follow-up to the audit in order to assess and document the measures taken by CATSA to implement the recommendations made by the Interim Commissioner of Official Languages. CATSA provided documents in March and June 2019 to report on the progress made and to follow up on additional questions, respectively. On September 25, 2019, in response to the preliminary audit follow-up report, the institution provided additional comments and documents, which were analyzed and taken into account in this final follow-up report.

The results of the audit follow-up are based on an analysis of the action plan submitted by CATSA in response to the recommendations made during the audit, supporting documents provided by CATSA, and information obtained in a meeting with CATSA representatives held on July 24, 2019. Like the audit, the follow-up looked at CATSA's area of activity that includes the screening of passengers, their carry-on baggage and their personal belongings at screening checkpoints in airports that are required to provide services in both official languages under the Act and the *Official Languages (Communications with and Services to the Public) Regulations* (the Regulations).

¹ Ottawa Macdonald-Cartier International Airport, Toronto Pearson International Airport (Terminal 1), Edmonton International Airport, Vancouver International Airport, Montréal Trudeau International Airport, Halifax Stanfield International Airport

Analysis

Recommendation 1

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority establish a network of regional official languages coordinators to support the regional directors in implementing the requirements of the *Official Languages Act*.

During the audit, CATSA committed to identifying regional official languages coordinators whose roles and responsibilities would include elements such promoting bilingualism in the workplace and representing their regions on CATSA's Advisory Committee on Official Languages. The Interim Commissioner of Official Languages was satisfied with this measure.

In May 2017, CATSA created a network of four regional coordinators, one per service delivery region (East, Central, Prairies and Pacific), to support the regional directors in their duties related to implementing the Act. These coordinators sit on CATSA's Advisory Committee on Official Languages—which meets, according to its terms of reference, at least four times a year—work with service providers on the delivery of bilingual services and promote the importance of providing bilingual services regionally. During Advisory Committee meetings, they discuss experiences specific to their regions, highlight specific issues and best practices, and find solutions to make the delivery of bilingual services more consistent across the country. In their discussions with service providers, they act as a liaison and monitor whether the service providers are delivering bilingual services and whether they are meeting the requirements they are subject to. The coordinators are also the resource people for official languages issues in the regions, and they ensure the promotion of official languages, in particular among new employees.

In light of the foregoing, Recommendation 1 has been implemented. The Commissioner has noted the creation of the network of regional coordinators and encourages them to continue their efforts to provide ongoing support to the directors in the implementation of the Act.

Recommendation 2

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority implement its decision to set official languages performance objectives for the vice-presidents for 2016–2017, apply this decision to the operations managers and directors reporting to the vice-presidents at headquarters and in the regions, and evaluate all these executives and managers based on these objectives.

During the audit, CATSA stated that it had already set official languages performance objectives for the vice-presidents and the operations directors who report to the vice-presidents at headquarters and in the regions. The Interim Commissioner of Official Languages was satisfied with this measure and acknowledged CATSA's proactive efforts in this regard.

During the July 24, 2019, meeting with CATSA representatives, the Office of the Commissioner reviewed the performance agreements of CATSA's vice-presidents and four regional directors to determine whether official languages performance objectives had been defined. CATSA provided performance agreements from 2016–2017 to 2018–2019. They all contained at least one objective related to official languages. The objectives targeted the promotion of official languages within the institution, internal communication in both languages, collaboration and work with service providers to improve service in both official languages, and the adoption of measures to ensure adherence to official languages requirements outlined in airport screening services agreements, etc.

In response to the preliminary follow-up report, CATSA informed the Office of the Commissioner that, contrary to what is stated in the recommendation, none of the operations managers report to vice-presidents. Therefore, the operations managers' performance agreements were not evaluated.

Overall, the review showed that the objectives related to official languages varied from year to year and were not consistent, in particular among the regional directors in the sense that some objectives were articulated more clearly than others. CATSA stated that performance objectives are context-specific and reflect the various needs of the position and the region for a given year while taking into account branch plans or the vice-presidents' overall objectives.

The Commissioner has noted that CATSA defined objectives related to official languages for its four vice-presidents and for some of its middle managers, including the four regional directors. One would expect these executives to be evaluated based on these objectives. The Commissioner encourages CATSA to continue in the same direction for all future performance agreements.

In light of the foregoing, Recommendation 2 has been implemented.

Recommendation 3

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority objectively review the linguistic identification of the positions of directors and general managers, Service Delivery, in the regions so that these positions accurately reflect senior management's commitment to official languages management and ensure official languages are just as visible in Western Canada as in Eastern Canada.

During the audit, CATSA stated that it had re-evaluated the linguistic profiles of its regional employees and the operational requirements in the regions and was satisfied with the model in place at that time. The Interim Commissioner of Official Languages stressed her disagreement with the institution's decision and expressed her opinion that these management positions are the face of CATSA in the regions and a visible reminder of its commitment to official languages. The recommendation was therefore maintained.

As part of the follow-up process, CATSA reconfirmed that it had already conducted an evaluation of the linguistic profiles of regional employees in 2017. It also noted that its current process to establish the linguistic identification of the positions is sound. This

process requires a review of the language requirements at the beginning of the staffing process when a position becomes vacant. CATSA maintains that, since the 2017 evaluation, only the Director of Service Delivery position in the Central Region has become vacant. The linguistic identification of this position had therefore been reviewed, and three of the four components of the position's linguistic profile—written comprehension, oral comprehension and oral expression in a second language—were set at an advanced level. The other component—written expression in a second language—was set at an intermediate level.

The Commissioner has noted the change to the linguistic profile of the Director of Service Delivery position in the Central Region. Although CATSA changes linguistic profiles only as part of a staffing process, it can, however, proactively review the language requirements and linguistic profiles of the positions cited in the recommendation in order to anticipate future staffing needs. The information submitted by CATSA does not demonstrate that it has conducted an objective review of the linguistic identification of the positions cited in the recommendation, taking the duties of those positions into account.

The Commissioner is of the opinion that the presence of directors and general managers at screening checkpoints and their interactions with employees of service providers highlight the importance of having linguistic profiles that reflect the necessary second-language proficiency. The Commissioner therefore encourages CATSA to be proactive and to conduct an objective review of the linguistic identification of the positions cited in this recommendation to ensure consistent language proficiency across the country.

In light of the foregoing, Recommendation 3 has been partially implemented.

Recommendation 4

The Interim Commissioner of Official Languages recommends that the standard operating procedure related to official languages be amended to state that active offer and service of equal quality in both official languages are inseparable in the application of security measures at screening checkpoints. The new procedure will have to be communicated to all front-line personnel.

During the audit, CATSA stated that its standard operating procedure related to official languages was aligned with the operational reality at screening checkpoints and took into consideration the fact that not all screening officers are required to be bilingual. However, CATSA did commit to examining how it could clarify its expectations with service providers in order to enhance procedures and the delivery of equal services. The Interim Commissioner of Official Languages was generally satisfied with the proposed measures. She stated that this was a step in the right direction, but that the institution would need to make it absolutely clear that there is an unbreakable connection that must exist between active offer and service of equal quality in both official languages.

CATSA determined that simply changing the standard operating procedure was not sufficient to address this recommendation. It concluded that publishing guidelines for service providers is a much more effective way to convey important expectations to them. Consequently, in March 2018, CATSA established a new directive for its service providers that spells out its expectations in terms of bilingual service delivery. The directive states that all screening officers must make an active offer on first contact with

the travelling public and that service in both official languages must be available at all times throughout the security screening process in order to guide travellers. CATSA provided information showing that the directive was distributed to its service providers and front-line personnel. The institution is of the opinion that the directive clearly states that in addition to making an active offer, service providers are required to guide travellers throughout the security screening process by answering questions and by providing detailed information in the official language of the travellers' choice.

The Commissioner has noted the new directive that details CATSA's expectations of service providers in terms of bilingual service. The directive clearly states that travellers must receive service in the official language of their choice throughout the security screening process. Although this is undoubtedly an improvement, the connection that is clearly established in the directive is not reflected in the standard operating procedure that was deemed inadequate during the audit. It is important for CATSA to understand that maintaining the connection between active offer and service in the traveller's preferred official language may not be possible if the standard requiring one bilingual screening officer for every two open screening lines continues to apply, particularly when there is a high volume of travellers, when several French-speaking passengers arrive at a screening point at the same time, or depending on the location of the supervisors in the event that the screening officer on duty is not bilingual. With the current standard operating procedure, travellers who request service in the official language of the linguistic minority may not receive service in the official language of their choice or may have to wait for service, which does not constitute the same quality of service in both official languages.

As the Interim Commissioner stated in response to CATSA's action plan, clarifying its expectations with service providers is a step in the right direction. However, CATSA must continue to think about ways to find proper solutions to address the real issue behind this recommendation.

In light of the foregoing, Recommendation 4 has been partially implemented.

Recommendation 5

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority ensure that all service providers apply a consistent approach to assessing and validating the language proficiency levels of bilingual screening officers so that the quality standard corresponds to a sufficient level of proficiency to communicate effectively in both official languages.

During the audit, CATSA stated that it is not prescriptive in its approach with service providers, nor does it impose a specific approach on them. According to the institution, service providers are required to ensure that the language proficiency of bilingual screening personnel is sufficient to provide for an equivalent level and quality of communication in both official languages. However, CATSA did commit to facilitating the sharing of best practices with its service providers to enhance the quality of their language proficiency assessments by establishing clear expectations. The Interim Commissioner of Official Languages was generally satisfied with the proposed measure.

In March 2018, CATSA issued a new directive for service providers that specifies its expectations in terms of the delivery of bilingual service. The institution expects all

officers to make an active offer on first contact with the travelling public and to ensure that service in both official languages is available at all times throughout the security screening process.

In addition to establishing how and when service must be provided in both official languages, the directive requires service providers to actively recruit and hire candidates who speak English and French and to evaluate the ability of bilingual candidates to provide service in both official languages, as described above. The directive also reiterates the fact that service providers should have a method to assess the second language proficiency of bilingual screening officers in relation to the expectations set out above. CATSA stated that, since the release of the directive, the service providers have implemented some of the measures with regard to assessing language proficiency. For example, a service provider assigned staff to assess the language proficiency of current screening officers and screening officer candidates. CATSA stated that the assessments evaluate certain second-language oral skills—accuracy, clarity, effectiveness and confidence—before current screening officers or potential candidates can be identified as bilingual.

With respect to sharing best practices, CATSA stated that official languages were added as a standing item on the agenda for Relationship Management Plan meetings with its service providers, which take place two to four times a year. However, none of the information it provided in this follow-up confirmed that best practices were shared on the subject of assessing language proficiency.

The Commissioner is encouraged that CATSA has a platform for regularly sharing best practices in official languages and that it has clarified its bilingual service expectations. He also recognizes that service providers are assessing the language proficiency of screening officers and that testing is being done. As part of this follow-up, CATSA provided information on sample tests used by the service providers, an analysis of which showed that the assessments are conducted through telephone or in-person interviews during which questions are asked in both official languages. In some cases, the criteria being assessed include precision, clarity of language, and the use of proper conjugation. In other cases, the assessment focused on tone of voice, structure of responses and organization of ideas. The test from one service provider assessed a much more comprehensive range of criteria than tests from other service providers. The Commissioner encourages CATSA to be clearer when sharing best practices in order to standardize, from one service provider to another, the way in which current and potential screening officers' levels of proficiency in their second official language are assessed. Although the directive is a step in the right direction and requires service providers to have a method for assessing the second language skills of bilingual screening officers, the fact remains that each service provider is deciding on how to apply the directive with regard to assessing the language skills of its bilingual screening officers, which means that there is no standardized assessment and validation of screening officers' second language proficiency among the various service providers. The methodological differences between service providers do not ensure an equal standard of quality in terms of the level of proficiency required for screening officers who represent CATSA to communicate effectively with the travelling public in both official languages across Canada.

In light of the foregoing, Recommendation 5 has been partially implemented.

Recommendation 6

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority take the necessary steps to assess demand for services in the minority official language at designated bilingual airports and review the current standard to ensure that service providers are able to provide service of equal quality in both official languages.

During the audit, CATSA committed to assessing the demand for services in the official language of the linguistic minority in Class 1 airports² through a passenger intercept survey. CATSA stated that it would then determine whether the current standard needed to be changed. The Interim Commissioner of Official Languages was satisfied with the proposed measures.

Beginning in the second quarter of the 2016–2017 fiscal year, CATSA included an official languages component in its passenger survey at Class 1 airports. Passengers were asked in which official language they would like CATSA screening officers to serve them. CATSA stated that 5,500 passengers answered the survey per quarter during 2017–2018, for a total of 22,000 passengers during the year. The eight Class 1 airports at which the survey was conducted were Montréal (Trudeau), Ottawa (Macdonald-Cartier), Toronto (Pearson), Vancouver, Calgary, Edmonton, Winnipeg (Richardson) and Halifax (Stanfield).

The results of the assessment showed that only the Montréal and Ottawa airports had at least a 5% demand for services in the official language of the linguistic minority (42.25% and 6.5%, respectively). Despite these results, senior management decided that it was not appropriate to change the current standard at these two airports. CATSA justified this decision based on the low number of complaints received over the past two fiscal years, the rate of bilingualism of screening officers (96% in Montréal as of March 3, 2018, and approximately 23% in Ottawa) and the level of satisfaction of travellers at these two airports (96% in 2017–2018). CATSA stated that it would continue to assess the demand for services in the official language of the linguistic minority at Class 1 airports and report the results each year to a senior management committee.

The Commissioner has noted the measures taken by CATSA to assess the demand for services in the official language of the linguistic minority at Class 1 airports. However, CATSA's language obligations are not limited to Class 1 airports. According to data provided by the Treasury Board of Canada Secretariat, CATSA has an obligation to provide services in both official languages in airports that are not Class 1 airports but that handle more than one million passengers per year. Even though CATSA's commitment was limited to Class 1 airports, the Commissioner encourages it to assess the actual demand in other designated bilingual airports that serve at least one million passengers.

² Ottawa Macdonald-Cartier International Airport, Toronto Pearson International Airport, Edmonton International Airport, Vancouver International Airport, Montréal Trudeau International Airport, Halifax Stanfield International Airport, Montréal-Mirabel International Airport, Calgary International Airport, Winnipeg Richardson International Airport. From *Canadian Aviation Security Regulations, 2012*, <https://laws-lois.justice.gc.ca/eng/regulations/SOR-2011-318/page-42.html#h-779249>, accessed January 16, 2020.

With respect to the methodology used to assess the demand for services in the official language of the linguistic minority, CATSA stated it is confident in the accuracy of the data it obtained when assessing actual demand. However, the Commissioner is of the opinion that there are still ongoing issues and that improvements may be required. Based on information provided by CATSA, demand for services in the official language of the linguistic minority in Class 1 airports was assessed by asking travellers the following question: "Thinking specifically about this airport, which Official Language would you like to be served in?" The three possible answers in the response table were "English," "French" and "No Preference." The No Preference option could result in CATSA's underestimating the demand for services in the official language of the linguistic minority at designated bilingual airports. For example, if No Preference means "either English or French," CATSA cannot assume that the only language in which service is required is the official language of the linguistic majority. The Act requires that the passenger be offered a genuine choice of service in either official language. In addition to having a methodology that meets statistical requirements, CATSA must also ensure that it collects the most reliable data possible about the demand for service in both official languages.

With respect to the current standard, the Commissioner is still of the opinion that the minimum requirement of having one bilingual officer on duty for every two open screening lines is clearly insufficient. During the audit, CATSA acknowledged that the standard of one bilingual officer for every two open screening lines may not have been sufficient in all cases to provide service of equal quality as required.

As CATSA pointed out, not all screening officers need to be bilingual. However, only CATSA can answer the question of how many bilingual officers are actually required. By obtaining an exact measurement of actual demand, the institution can determine its needs and assign bilingual officers strategically. Although CATSA committed to reviewing the standard in situations where demand for service in the official language of the linguistic minority is at least 5%, the Commissioner is of the opinion that it should not limit itself to this condition, given that its language obligations are clearly described in the Act and in the Regulations.

Subsection 7(3) of the Regulations states the following:

For the purposes of subsection 23(1) of the Act, there is significant demand for services to the travelling public . . . from an office or facility of a federal institution in both official languages where the facility is an airport or the office is located in an airport and over a year the total number of emplaned and deplaned passengers at that airport is at least 1,000,000.

CATSA therefore needs to get creative in establishing a standard that ensures that its services are always provided in both official languages when necessary. It is also important to understand that the number of complaints is not in and of itself enough of an indicator of the actual quality of the service provided.

The Commissioner is encouraged that CATSA has fulfilled its commitment by assessing the demand for services in the official language of the linguistic minority. However, this audit follow-up clearly shows that the issues behind this recommendation remain unaddressed. The Commissioner encourages CATSA to consider the comments provided in order to improve its practices.

In light of the foregoing, Recommendation 6 has been partially implemented.

Recommendation 7

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority implement a mechanism to measure the availability and equal quality of service in both official languages and that it take this mechanism into consideration when measuring official languages performance under the Service Excellence Program.

During the audit, CATSA conducted observations through “mystery shopping” activities in order to verify the quality of services provided during pre-boarding screening. It included an official languages component in the observations so that active offer and the availability of service in the passenger’s preferred official language could be evaluated. CATSA committed to reviewing the feasibility of incorporating the data collected through these activities into the Service Excellence Program portion of its oversight program. It also committed to exploring options for incorporating the element of quality of bilingual service delivery into its annual customer service evaluation. The Interim Commissioner of Official Languages was satisfied with the proposed measures.

CATSA reviewed the feasibility of incorporating the data collected as part of its observations into the Service Excellence Program portion of its oversight program. According to the institution, however, the sample size was very small, and the data collected was not statistically significant. CATSA also stated that the cost of having enough resources to obtain statistically significant results was very high. Therefore, no observation exercise has been carried out since the first assessment, which took place in 2015. When it comes to evaluating the availability and equal quality of service in both official languages, CATSA is of the opinion that the results of its passenger intercept survey are more appropriate and reliable. It stated that the results of the survey are therefore used as one of the elements in the calculation of the client satisfaction index for the Service Excellence Program.

The Commissioner acknowledges that CATSA examined options for verifying the quality of services provided during pre-boarding screening. However, a review of the questions asked in the passenger survey shows that although CATSA collected data on the availability of service, none of the information provided by the institution showed that the quality of service was evaluated. To determine whether the satisfaction index provides an indication of the quality of service in both official languages, it is important to know what proportion of the survey questions were about official languages. However, this information was not provided for the follow-up. It should also be noted that CATSA did not submit documents that show how the availability and quality of service in both official languages in the client satisfaction index are included in the Service Excellence Program’s performance measurement.

In light of the foregoing, Recommendation 7 has been partially implemented.

Recommendation 8

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority review its official languages standards under the Contract Compliance Program and that it make the consequences of failing to meet these new standards consistent across all regions.

During the audit, CATSA acknowledged that the consequences of failing to meet the official languages standards should be consistent across all regions. However, according to the institution, the Contract Compliance Program was designed to hold service providers accountable for the specific commitments they made in their submissions in response to CATSA's request for proposals for the airport screening services agreements. As a result, the compliance criteria for meeting official languages obligations differ from region to region. CATSA reiterated that the consequences of not meeting the compliance requirements set out in the Contract Compliance Program are consistent across all regions because they entail the issuance of a request for a performance improvement action plan. The Interim Commissioner of Official Languages disagreed with CATSA's decision not to take any measures to address this recommendation.

In response to this recommendation, CATSA confirmed that it is in the process of developing a tool that will help assess the staffing level of bilingual screening officers and determine the number of officers required at each checkpoint to meet the basic bilingual staffing requirements of one bilingual officer for every two open screening lines, which is also one of the criteria of the Contract Compliance Program. Once the tool is ready, CATSA expects to update the Program to include the results of this tool. CATSA stated that the interim report on this tool highlights the importance of assessing the demand for service in the official language of the linguistic minority, in accordance with the Act and the clauses in the service contracts. CATSA has taken measures to resolve these issues.

Regarding the consequences of not meeting the official languages requirements in the Contract Compliance Program, CATSA did not indicate any specific changes. It reiterated that service providers are requested to submit a performance improvement action plan in cases of non-compliance with the Program's requirements (language or other) and that this is done consistently across all regions.

The Commissioner has noted CATSA's efforts to ensure that service providers meet the basic requirement of assigning one bilingual officer for every two open screening lines. However, as noted in Recommendation 6, he is still of the opinion that this standard is insufficient to ensure service of equal quality in both languages at all times. With regard to the official languages standards in the Contract Compliance Program, none of the recommended changes have been made to date, which means that consequences have not been established for service providers that do not meet the new official languages standards.

As CATSA prepares to return to the market for new screening service contracts, the Commissioner encourages it to take the opportunity to review its official languages standards and criteria in order to incorporate the improvements recommended in the audit.

In light of the foregoing, Recommendation 8 has not been implemented.

Recommendation 9

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority review the linguistic identification of the positions of its performance officers in airports and ensure a sufficient number of bilingual officers to effectively monitor and measure service of equal quality in both official languages.

During the audit, CATSA committed to revisiting the linguistic identification of some performance officer positions to increase its bilingual oversight capacity. The Interim Commissioner of Official Languages was satisfied with this measure.

Following the audit, CATSA stated that it had conducted an analysis of the linguistic identification of all performance officer positions in airports to ensure that there were enough bilingual officers to monitor and measure the quality of service in both official languages. This analysis found that the number of bilingual employees had been underestimated, as some bilingual employees were in “English Essential” positions. The analysis also revealed, however, that there were no bilingual performance officers available in Vancouver or Calgary to monitor and measure the quality of service in both official languages. Following this analysis, CATSA decided that it was not necessary to change the linguistic identification of the positions and that they could be identified as “Bilingual” once they became vacant.

The Commissioner has noted CATSA’s efforts in this area. However, the institution must ensure that it conducts an objective review of the linguistic identification of the positions and not a review of the language proficiency of individual employees. Changing a position’s language requirements just because the incumbent is bilingual is not appropriate and does not ensure continuous bilingual capacity independent of staff turnover. An objective review was therefore not conducted.

It is important to note that the data CATSA provided for eight Class 1 airports showed that 13 out of 46 performance officers are bilingual. This ratio, which is similar to that seen during the audit, is not sufficient to ensure effective monitoring and measurement of service of equal quality in both official languages. Although CATSA stated that in Class 1 airports, service delivery managers, team leaders and one airport terminal director are available to support the performance officers as needed and to increase the bilingual capacity of the performance officers, the job description for a performance officer clearly outlines the monitoring role through observation of the service provider’s operational performance. Furthermore, CATSA has not shown in the job descriptions that this role is also included in the duties of managers, team leaders or terminal managers. Delegating a task to a manager because of insufficient bilingual capability is not an acceptable permanent solution. CATSA must ensure that in the long term it increases the number of bilingual performance officers to effectively monitor and measure the delivery of service of equal quality in both official languages.

The Commissioner would like to reiterate how important it is for CATSA to objectively review the linguistic identification of the performance officer positions in order to proactively assess its needs and to put administrative measures in place to fill any gaps in performance officer bilingual capacity. A clear picture of the situation will help CATSA determine where efforts are needed.

In light of the foregoing, Recommendation 9 has not been implemented.

Recommendation 10

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority take steps to ensure that service providers increase the pool of bilingual screening officers within their organization and support them in:

- strengthening connections with official language minority communities;
- taking part in recruitment events, such as job fairs; and
- adopting internal strategies to give bilingual employees an advantage and to promote screening officers' acquisition or further development of second-language skills, particularly by providing language training.

During the audit, CATSA committed to supporting, within its means, service providers in their recruitment efforts by developing a reporting mechanism to document their progress and by encouraging them to communicate with official language minority communities. The Interim Commissioner of Official Languages was generally satisfied with the proposed measures.

In response to this recommendation, CATSA's Vice-President of Service Delivery sent a letter to the institution's service providers reiterating the need for them to step up their recruitment efforts in order to attract bilingual candidates. In the fall of 2018, following consultations with official language minority communities, CATSA provided community contact information to its service providers so that they could establish a relationship with them and see how they could work together to recruit bilingual candidates. CATSA stated that, in addition to receiving the contact information following the consultations, the service providers also contacted other Francophone community organizations, including Connexions Francophones, the Fédération des francophones de la Colombie-Britannique and Canadian Parents for French. The institution added that the service providers have noted a significant increase in the number of candidates for bilingual positions.

With regard to recruitment strategies, CATSA explained that service providers had created permanent job postings for bilingual positions and are using bilingual referral programs that include bonuses for bilingual candidates hired through a referral. The service providers promote bilingual jobs on social media and have established partnerships with Francophone employment services organizations. They also use local job search bulletin boards to attract bilingual candidates. As noted in the audit report, in addition to recruiting campaigns, strategies are needed to retain bilingual employees so that service providers can meet their language obligations in some regions. The information provided showed that one service provider has begun to examine the issue of retention. The Commissioner encourages CATSA and its service providers to continue their efforts in coming up with ways to retain bilingual employees.

With regard to acquisition of second-language skills, CATSA confirmed that following the publication of the directive on bilingual services, employees of one of the service providers are now required to take an on-line French training course. Modules for developing French skills specifically for security screening have also been developed.

The Commissioner has noted the various initiatives CATSA and its service providers have implemented to increase the pool of bilingual screening officers. The recruiting approaches seem promising in terms of improving the institution's capacity to provide service of equal quality in both official languages.

In light of the foregoing, Recommendation 10 has been implemented.

Recommendation 11

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority review the official languages training provided for screening officers by third-party service providers to ensure greater cross-regional consistency in approach and content.

During the audit, CATSA committed to exploring whether guidelines could be developed to clarify its expectations regarding language proficiency for bilingual screening officers. The Interim Commissioner of Official Languages was satisfied with this measure.

The directive on bilingual services CATSA published in March 2018 for its service providers specifies its expectations regarding bilingual service delivery. CATSA expects all screening officers to make an active offer on first contact with the travelling public and to ensure that service in both official languages is available at all times throughout the security screening process. The directive also states that when a service provider's bilingual capacity is too low, it must put training programs in place to ensure that both current screening officers and new recruits can provide bilingual service as outlined above. Note that during the audit, some screening officers mentioned a number of things they would like to see in terms of training, including more simulations with the assistance of bilingual employees on how to implement the procedure, and adding official languages components to the simulation exercises.

In response to this recommendation, CATSA stated that its service providers have taken a number of measures following the publication of the directive, including mandatory on-line training in French (for one service provider), modules tailored to the screening environment to develop skills in French, and training that includes scenarios related to the screening environment.

The Commissioner is encouraged that some service providers have adapted their training to the screening environment. He also thinks that the directive on bilingual services is a good practice that helps CATSA to clarify its bilingual service expectations. However, the information provided during the follow-up process showed that service providers are still using different training tools. Material from one training course in particular seemed to be better structured than the others and, in some cases, training was still in the form of ad hoc reminders, as noted in the audit report. Although CATSA has stated in its directive that suppliers must provide training programs for their screening officers, this general statement does not specify which language skills service providers should be targeting in bilingual screening officers' training. Each service provider is therefore deciding how to apply the directive when developing its official languages training material.

The Commissioner is of the opinion that CATSA would benefit more from standardizing the content of the official languages training provided by its third parties. It could also, as a good practice, share its training material with its service providers to ensure that they have a more consistent understanding of the language obligations to the travelling public.

In light of the foregoing, Recommendation 11 has been partially implemented.

Recommendation 12

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority take measures to encourage service providers to implement a strategic reorganization of personnel at screening checkpoints so that an optimal number of bilingual officers are available to provide service of equal quality in the preferred official language of members of the travelling public.

During the audit, CATSA committed to encouraging service providers to be more strategic, whenever feasible, when assigning positions and/or responsibilities to their bilingual personnel. The Interim Commissioner of Official Languages was satisfied with this measure.

In response to the recommendation, CATSA stated that it is continuing to work with its service providers to actively look for ways to support screening officers in order to ensure that services are available in both official languages. For example, it is in the process of developing a tool that will allow it to check service providers' capacity to meet the standard for assigning bilingual screening officers (i.e., one bilingual officer for every two open screening lines). The results from this tool will be analyzed twice a year and reviewed with each service provider. CATSA stated that the tool should be automated by the end of the 2019–2020 fiscal year. At the time of writing this report, the tool had yet to be operative.

Shortly before the audit, CATSA had amended the service agreements with its service providers, allowing them to suggest other solutions to ensure compliance with their official languages obligations without specifically imposing standardized measures. It is important to note that, in the time since the change was made in 2015, no solution has been proposed.

Following the publication of the audit report in 2017, CATSA stated that it had initiated a pilot project at Calgary International Airport. As part of this pilot project, new client service specialist positions were created to provide, among other things, improved bilingual service at a specific screening point that had had a high level of negative feedback in terms of bilingual service. For six months, these bilingual specialists were responsible mainly for discreetly (through the use of a pager) meeting screening service needs in the official language of the linguistic minority, for supervising screening officers and for meeting clients' needs in order to make their experience smoother throughout the screening process. During periods of low passenger traffic, the specialists also did some proactive monitoring. The results of this project were very positive, and managers noted an increase in compliance with the Act as a result of the fact that service in the official language of the linguistic minority was quickly accessible when requested, to the satisfaction of the travellers. CATSA did not, however, explain how it intended to capitalize on the positive results of this pilot project.

The Commissioner has noted CATSA's efforts to implement a tool that will allow it to monitor whether the standard of assigning one bilingual officer for every two open screening lines is being met. The pilot project at Calgary International Airport seems particularly interesting. CATSA is therefore encouraged to continue thinking about ways to strategically assign its screening officers at all stages of the security screening process while taking the operational reality at each airport into consideration. The institution could also explore the feasibility of expanding the initiative undertaken at

Calgary International Airport to all designated bilingual airports so that it can ensure service of equal quality in both official languages until it has a sufficient number of bilingual officers.

Overall, although CATSA has made efforts, no measure has been taken in response to this recommendation to encourage all service providers to adopt a more strategic approach, whenever possible, in assigning positions and responsibilities to their bilingual employees.

In light of the foregoing, Recommendation 12 has been partially implemented.

Recommendation 13

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority use signs to inform passengers, outside of screening checkpoints and at the beginning of the security screening process, of their right to be served in their preferred official language to support screening officers in quickly identifying the needs of travellers when making an active offer of service in person.

During the audit, CATSA committed to developing checkpoint signs to inform passengers of their language rights at bilingual airports. The Interim Commissioner of Official Languages was satisfied with this measure.

CATSA prepared signs to inform passengers at the beginning of the security screening process of their right to be served in their preferred official language. CATSA's communications team sent an e-mail to regional representatives in March 2018, asking each region to put up the sign and confirm that it had been installed. The sign reads "En français ou en anglais, c'est votre choix. English or French, it's your choice." CATSA provided images showing that the signs have been put up and are being used outside of the screening checkpoints. However, it is important that CATSA ensures that these signs are a permanent fixture in all airports that have official languages obligations.

In light of the foregoing, Recommendation 13 has been implemented.

Recommendation 14

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority implement an ongoing consultation process with official language minority communities and take into account the results of these consultations to improve services provided in both official languages.

During the audit, CATSA committed to consulting official language minority communities on an annual basis through its Official Languages Champion. The Interim Commissioner of Official Languages was satisfied with this measure.

In response to this recommendation, CATSA identified the following eight groups representing official language minority communities, which it consulted in the fall of 2018: the Association canadienne-française de l'Alberta, the Fédération des communautés francophones et acadienne du Canada, the Fédération des francophones de Terre-Neuve et du Labrador, the Société de l'Acadie du Nouveau-Brunswick, the Société de la francophonie manitobaine, the Société nationale de l'Acadie, the Société

Saint-Thomas d'Aquin and the Quebec Community Groups Network. The purpose of the consultation was to explore opportunities for working together with the communities in order to improve service in both official languages. CATSA stated that only half of the groups identified responded to the on-line consultation. Following this exercise, CATSA shared the groups' contact information with its service providers to help them in their future staffing processes. It is important to note, however, that no group representing the province of Ontario, which has the busiest airport in Canada (Toronto), or the region of Ottawa, the nation's capital, was selected as part of this consultation.

CATSA also said that another consultation will take place in 2019–2020 and that additional efforts will be made in order to increase the participation rate of the official language minority communities and to include a wide range of organizations representing each province. The institution is also developing a community awareness plan to support this ongoing consultation process.

The Commissioner commends CATSA on this initial consultation exercise and encourages it to continue its efforts in this direction. To date, this process does not seem to be permanent and has not yet been made official. The Commissioner encourages CATSA to take the necessary measures to ensure that it maintains an ongoing and permanent relationship with official language minority communities in order to see how it can improve its client service and better understand the expectations of this target audience, which was not clearly achieved with the questionnaire used during the last consultation. This will help CATSA meet the standard of substantive equality in the delivery of services and comply with the requirements under Part IV of the Act. CATSA is also encouraged to participate actively in provincial and territorial official languages committees, whose responsibilities include facilitating consultation initiatives with community organizations.

In light of the foregoing, Recommendation 14 has been partially implemented.

Recommendation 15

The Interim Commissioner of Official Languages recommends that the Canadian Air Transport Security Authority, as part of its review of data collection activities and methods, including passenger surveys at screening checkpoints, make methodological improvements to ensure statistically valid data is collected on the availability and quality of services provided to the Francophone travelling public.

During the audit, CATSA committed to reviewing its methodology for surveying passengers and to evaluating how it could increase its sample of Francophones. The Interim Commissioner of Official Languages was satisfied with the proposed measure.

In response to this recommendation, CATSA reviewed its data collection activities and methods with its survey supplier. Based on its analysis, CATSA is still confident that its methodology is the most appropriate for obtaining statistically valid data. The data is collected at random from passengers, so there is no statistical bias in the responses. The random sample is in line with the passenger population data and eliminates statistical bias and data asymmetry. The data is collected immediately after the screening process, which eliminates memory issues. CATSA explained that it is unnecessary to expand the sampling of a specific community because it can perform a statistical analysis based on the demographics of its data without conducting a separate

survey that might not be reliable. Therefore, no improvements were made to the methodology.

The Commissioner has noted CATSA's review of its data collection methods. Although the institution's methodology respects statistical requirements, the Commissioner again encourages CATSA to review its methodology in light of the comments made regarding Recommendation 6. Issues related to measuring preferred official language could result in an underestimation of the demand for service in the official language of the linguistic minority.

In light of the foregoing, Recommendation 15 has been partially implemented.

Conclusions

Audit follow-ups are as important as the audits themselves because they help to assess the extent to which the audited institution has made the changes recommended in the audit reports or to confirm its commitment to doing so.

During the follow-up, CATSA stated that it was proud of its initiatives and the measures it had taken to meet its official languages obligations. It also stated that these efforts had helped to improve the official languages culture among its service providers and screening officers. The Commissioner has noted that CATSA has indeed introduced several initiatives both internally and with its service providers, further to the audit. For example, it created a network of regional official languages coordinators who will be able to help ensure that the Act's requirements are met in the regions. It also developed and released one of its more important efforts: the directive on bilingual services. The Commissioner has made particular note of the positive results of the pilot project at Calgary International Airport to improve traveller satisfaction, including regarding the provision of bilingual service throughout the screening process. He encourages CATSA to continue its examination of this subject.

The Commissioner understands the unique challenges CATSA has because of its third-party business model, and he is encouraged by the efforts it has made to integrate official languages into the execution of its mandate. CATSA is on the right track, and these are the first steps on a long road to addressing the systemic issues that are preventing it from being in full compliance with the requirements of the Act. Currently, however, these issues clearly still exist, and the measures CATSA has taken to address the audit recommendations, even though they are included in its action plan, have still not rectified the issues raised during the audit. The follow-up has shown that insufficient bilingual capacity and the current standard of one bilingual screening officer for every two screening lines do not ensure that service is always provided in the official language of the linguistic minority whenever needed. Although there was an increase in the number of bilingual candidates, the impact of the recruitment efforts is yet to be seen, since the number of bilingual screening officers is still much the same as it was during the audit. The Commissioner maintains that the standard of one bilingual officer for every two open screening lines does not guarantee service of equal quality in both official languages.

Both Part IV of the Act and the Regulations clearly set out the right of the travelling public to be served in the official language of their choice. CATSA is mandated to protect the public and therefore must ensure that it provides its services in both official languages in order to establish clear communications with the travellers and provide them with a sense of safety throughout the security screening process. The Commissioner has noted CATSA's commitment to official languages and urges the institution to continue its efforts to ensure that all travellers have a positive experience.