

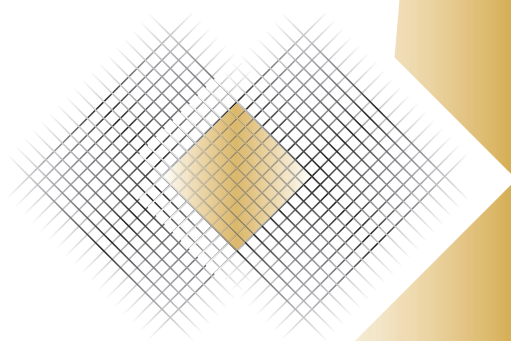


Office of the  
Commissioner of  
Official Languages

Commissariat  
aux langues  
officielles

# Audit

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



- 1.1 As a Crown corporation, Canada Post is required to respect the *Official Languages Act* and Official Languages (Communications with and Services to the Public) Regulations. Canada Post has approximately 7,000 postal outlets delivering services directly to the public. Close to 800 of these outlets are designated bilingual under the Act and the Regulations.

## Audit Objective and Methodology

- 1.2 Several factors led us to undertake this audit. For example, Canada Post has bilingual postal outlets across Canada, many of these outlets are operated by third parties on behalf of Canada Post, and we receive complaints from the public annually regarding service provided in customers' preferred language at these bilingual outlets. Although the overall number of complaints has been decreasing, their repetitive nature suggested to us that a comprehensive examination could result in recommendations that may improve Canada Post's provision of services at bilingual postal outlets, and that Canada Post needs to develop innovative measures to deal with language of service issues. Accordingly, our audit examined whether Canada Post ensures that adequate services are provided to the public in its choice of language at bilingual postal outlets. Specifically, we examined senior managers' commitment to providing services in both official languages, reviewed systems and procedures in place to encourage and monitor services, and assessed service provided at bilingual postal outlets.

## Observations and Conclusions

### **Official languages at Canada Post**

- 1.3 Our audit found that Canada Post's senior managers are committed to providing services in both official languages at bilingual postal outlets. Canada Post has an official languages policy, which includes a section on communications with and service to the public. An official languages group facilitates compliance and there are official languages co-ordinators in each of the seven regional offices. Responsibility for enforcing official languages requirements in postal outlets rests with Field Operations. Senior management is informed of compliance with the policy, although the results of our audit show that it needs to be more proactive to ensure provision of services in both official languages at bilingual outlets.


### **Communication of language of service requirements**

- 1.4 Canada Post communicates language of service requirements to its employees responsible for corporate outlets and to partners who operate dealer outlets. However, this has not

always translated into the full provision of bilingual services. Canada Post needs to assess additional means of conveying the importance of language of service requirements to those responsible for bilingual postal outlets.

### **Service provided at bilingual postal outlets**


- 1.5 Our examination of 64 bilingual postal outlets across the country yielded varied results. We noted that in most cases, corporate outlets performed better than dealer outlets.
- 1.6 While most permanent signs and documents were available in both languages, only 38 percent of corporate outlets and 54 percent of dealer outlets had official languages pictograms at or near counters informing the public that services were available in both languages. Overall, only 10 percent of corporate outlets and dealer outlets provided an in-person verbal active offer of service in both languages. Although the results were better regarding the over-the-telephone verbal active offer, with 70 percent of corporate outlets and 35 percent of dealer outlets providing a greeting in both languages, the situation is far from satisfactory.
- 1.7 We found that one of every four, or 24 percent, of bilingual outlets visited could not provide satisfactory in-person service in the minority language. This was less so in corporate outlets than in dealer outlets: 19 percent of corporate outlets were unable to provide service as opposed to 31 percent of dealer outlets. The same observation held true for services provided over the telephone – 19 percent overall, or 12 percent of corporate outlets and 30 percent of dealer outlets.
- 1.8 Canada Post needs to strengthen its capacity to provide services in both official languages at bilingual corporate outlets. Canada Post has a system in place to report the bilingual capacity of its staff in bilingual outlets – how many bilingual employees it has assigned to each outlet. This is a necessary first step to ensure that bilingual staff are always available. We also observed that Canada Post requires its counter personnel to achieve a level-A proficiency – the lowest level at Canada Post – in their second language. As Canada Post does not require employees to be retested, any slippage in proficiency, in our opinion, results in an inability to provide satisfactory service to customers in the minority language.
- 1.9 The language clause and standards in the dealership agreement are strongly worded and clearly written. However, dealer outlets are less likely than corporate outlets to provide adequate services in the minority language. Dealer outlets require more assistance from Canada Post to provide satisfactory services in both languages. Canada Post needs to reconsider how it interacts with designated bilingual dealer outlets to ensure provision of services in both official languages.

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- 1.10 Canada Post is finalizing the updated list of bilingual postal outlets necessitated by the 2001 Census results. There had been no formal process for consulting with linguistic minority communities when Canada Post was deciding which postal outlets would have bilingual services. But in light of the latest changes, Canada Post is now establishing a more formal process for consulting with linguistic minority associations. We are encouraged by this development.
- 1.11 Canada Post operates a network of satellite Service Canada Access Centres across the country as part of the Service Canada network. Nine of the outlets we visited had satellite centres. We observed that in all but one case, documents were available in both languages, although in some instances we had some difficulty obtaining service in the minority language when we asked for assistance.

### **Managing the level of service**

- 1.12 Canada Post has a number of mechanisms in place to measure and monitor adherence to language of service requirements at outlets designated bilingual. While these mechanisms are new and will need to be strengthened, they constitute an adequate framework to monitor compliance. Canada Post must ensure that it takes formal, rather than informal, corrective actions to fix identified deficiencies.
- 1.13 The appraisal tool used by the Corporation to assess its managers' annual performance does not contain a section dealing explicitly with official languages and with responsibility for language of service at bilingual outlets. We believe that, for bilingual service to be a major priority, managers responsible for bilingual outlets should have their performance assessed to ensure that services are available in both official languages.

### **Recommendations**

- 1.14 We have made 14 recommendations to Canada Post to improve its service at bilingual postal outlets. The recommendations are directed at communication of language of service requirements; the bilingual capacity of corporate and dealer outlets; formal consultation with linguistic minority associations; the monitoring of bilingual outlets; and the accountability of Canada Post managers. Senior managers at Canada Post need to demonstrate leadership and need to take the necessary steps to address recurring issues.
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# I NTRODUCTION

- 1.15 Canada Post has a long and storied history in Canada, one intricately connected to the country's history and development. The post office was one of the first federal government departments formed after Confederation, and it took over the postal service in 1868. Canada Post has been a presence in virtually every community across Canada. It is a service used for personal, social and commercial purposes by most Canadians.
- 1.16 Canada Post changed from a federal department to a Crown corporation in 1981 with the passage of the *Canada Post Corporation Act*, which mandates it to operate Canada's postal service on a self-sustaining basis with a standard of service that meets the needs of Canadians (Exhibit 1 outlines the Corporation's objectives as stated in the Act). Canada Post is one of the largest employers in Canada, with 55,000 employees. The Corporation's 2002 consolidated revenues were \$6,154 million, with a net income of \$71 million.

## **Exhibit 1:** Canada Post Corporation - Objectives

The objectives of the Corporation are:

- to establish and operate a postal service for the collection, transmission and delivery of messages, information, funds and goods both within Canada and between Canada and places outside Canada;
- to manufacture and provide such products and to provide such services as are, in the opinion of the Corporation, necessary or incidental to the postal service provided by the Corporation; and
- to provide to or on behalf of departments and agencies of, and corporations owned, controlled or operated by, the Government of Canada or any provincial, regional or municipal government in Canada or to any persons services that, in the opinion of the Corporation, are capable of being conveniently provided in the course of carrying out the other objects of the Corporation.

Source: *Canada Post Corporation Act*, 1985

- 1.17 The Corporation is headed by its President and Chief Executive Officer, who is appointed by the Governor in Council. The Corporation's Management Executive Committee is the principal advisory body for day-to-day management and consists of senior managers from key functions across Canada Post. It serves as a forum for senior managers to discuss issues affecting the Corporation.
- 1.18 Canada Post's headquarters are located in Ottawa, with regional offices in Halifax, Montreal, Toronto, London, Winnipeg and Vancouver. Each regional office has a General Manager, Operations, who reports to the Vice President, Field Operations in Ottawa. Canada Post has approximately 7,000 postal outlets, including approximately 2,700 dealer outlets (or franchises) operated by the private sector on behalf of the Corporation.

- 1.19 Canada Post indicates there are several advantages to having dealer outlets operated by the private sector. Dealer outlets have lower costs, as they are mainly front-end operations (i.e. they offer services at the counter only). They are more accessible to the public than Corporation outlets, as they are often located within businesses such as pharmacies and convenience stores with extended hours of service. A significant disadvantage for the Corporation is that it has less direct control over the operation of dealer outlets.

### Canada Post is subject to *Official Languages Act*

- 1.20 The purpose of Canada's *Official Languages Act* is to ensure respect for English and French as the official languages of Canada and to ensure equality of status and equal rights and privileges as to their use in all federal institutions. Among other things, the Act guarantees services in English and French where there is significant demand, according to the Act and the *Official Languages (Communications with and Services to the Public) Regulations*. The Act applies to all federal institutions, including Crown corporations such as Canada Post. Canada Post is responsible for taking necessary measures to meet its obligations under the *Official Languages Act* and pursuant regulations, and to apply the policies in the context of its own mandate.
- 1.21 Under the Act and Regulations, Canada Post has postal outlets designated bilingual across the country. Of the close to 800 outlets that are designated bilingual, just under 300 are dealer outlets that nevertheless remain subject to the *Official Languages Act* (see Exhibit 2).

#### **Exhibit 2: Services Provided on behalf of Federal Institutions**

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

Source: Section 25, *Official Languages Act*, 1988

## Focus of the audit

- 1.22 This audit is a continuation of the Commissioner's efforts to ensure that services are offered by federal institutions in both official languages where required. While Canada Post Corporation has many responsibilities under the Act, this audit focused on its responsibilities for communications with and services to the public. More specifically, our audit examined service to the public at postal outlets, as this represents Canada Post's most frequent contact with the public and it is a service that virtually all Canadians use.
- 1.23 The overall rationale of the audit, therefore, was to determine the extent to which Canada Post Corporation ensures that adequate services are provided to the public in clients' choice of official language at postal outlets that are identified as providing bilingual services. The audit objectives were to determine whether:
- senior management at Canada Post Corporation is committed to providing services to the public in both official languages at designated postal outlets;
  - Canada Post Corporation has in place appropriate systems and procedures to ensure that its designated postal outlets (corporate outlets and dealer outlets) provide services in both official languages;
  - individual postal outlets that are designated bilingual provide adequate services in both official languages; and
  - Canada Post Corporation monitors postal outlets' performance with respect to providing services in both official languages and reports formally on the results of this monitoring.

As part of our audit we also looked at services provided at 64 individual corporate outlets and dealer outlets in several regions across Canada. More details about this audit's objectives, scope and approach are provided in *About the Audit* at the end of this report.

## Official languages at Canada Post

### **Canada Post's official languages policy sets out requirements for service to the public**

- 1.24 Canada Post has an official languages policy, approved by the President and Chief Operating Officer and by the Chairman of the Board of Directors. The policy outlines requirements covering language of work, equitable participation, complaints, and communications with and services to the public. We found that the language of service provisions in Canada Post's official languages policy are consistent with the *Official Languages Act*.
- 1.25 The section of the Corporation's policy on communications with and services to the public states that the public has a right to communicate with and receive available services in either official language in the National Capital Region or at any office or facility where there is significant demand, or whenever it is required owing to the nature of the office. It adds that services provided by third parties on behalf of the Corporation must be offered on the same basis as if the Corporation was providing them. Corporate postal outlets and dealer outlets designated to provide bilingual service must give clear verbal and visual indications of their readiness to do so. We found this section to be consistent with section 25 of the Act.
- 1.26 We noted that while the Corporation's policy does make reference to ensuring application of the policy, the document does not identify the Corporation's various monitoring mechanisms and the frequency of their application. It is important that Canada Post clearly outlines in the policy its monitoring mechanisms and the frequency and nature of their application, in order to further accentuate its commitment to serving the public in both official languages and to serve as a reminder to those serving the public of the importance of providing service in customers' choice of language.
- 1.27 Recommendation 1. *Canada Post should ensure that its policy on official languages explicitly includes a section on monitoring mechanisms and responsibilities in order to reinforce the importance it places on serving the public in both official languages.***

### **Corporate official languages group facilitates compliance**

- 1.28 Canada Post has an official languages group, headed by a national co-ordinator, who reports to the vice president of human resources. The group is responsible for developing, implementing and revising official languages policies, programs and practices; promoting general understanding by Corporation employees; formulating corporate goals and strategies; investigating and resolving complaints; dealing with related federal government agencies; and preparing corporate annual reports, progress reports and action plans.

1.29 There are also regional official languages co-ordinators in each of Canada Post's seven regional offices. They are responsible for working to enhance the profile of official languages in regions, for acting as advisors, for helping with staffing issues as related to language, for responding to complaints regarding language of service and for preparing monthly reports on official languages issues, which they forward to the national co-ordinator. They also contribute to the Corporation's annual reports on official languages. The regional co-ordinators report not to the national co-ordinator, but rather to the head of human resources in their region. Official languages responsibilities form only part of their range of work activities. They also have several other human resources responsibilities, and in some cases they are responsible for covering vast regions of the country. We observed that this makes promoting use of official languages challenging, and that their activities in this area are more reactive than proactive in nature.

**1.30 Recommendation 2. *Canada Post should conduct a formal review to determine if it has sufficient bilingual resources in place in its regional offices to actively promote official languages objectives.***

### **Field Operations is responsible for language of service in postal outlets**

1.31 The policy states that responsibility for properly applying and enforcing language of service requirements in designated bilingual outlets falls to Field Operations (Head Office). This responsibility is delegated to Field Operations general managers in each of the seven regions who in turn ensure the standards are applied in their respective bilingual outlets.

1.32 Canada Post has implemented mechanisms, such as the Sales Performance Review Checklist, that involve the Corporation monitoring postal outlets, including those outlets designated bilingual. These mechanisms are discussed in more detail in paragraphs 1.90 to 1.102.

### **Senior management is informed of compliance with the policy**

1.33 We found that Canada Post's senior managers review key reports on official languages and presentations at Management Executive Committee meetings, and as such are informed about compliance with the policy. The President and Chief Executive Officer reviews annually and approves the Annual Report to the Treasury Board on parts IV, V and VI of the *Official Languages Act*, and the Annual Report to Canadian Heritage on part VII of the *Official Languages Act*. The former report outlines issues related to official languages, including language of service, and various actions undertaken to improve compliance with the Act.

- 1.34 In addition, the results of key internal reports dealing with bilingual postal outlets, such as the 2002 internal audit on language of service at bilingual outlets, are presented to the Corporation's Management Executive Committee for comments and approval. During these committee meetings, senior managers are made aware of corrective actions that respond to key reports. Senior management is also provided with results from other monitoring processes such as the Mystery Shopper Program and the Sales Performance Review Checklist system.
- 1.35 Finally, the manager of the official languages group reports regularly to the Vice President of Human Resources, who is a member of the Corporation's Management Executive Committee. For example, the manager compiles monthly reports on official languages complaints. This helps to ensure that senior managers quickly become aware of any issues regarding language of service that may arise. However, given the results of our audit, which show that obtaining service in both official languages is problematic (see paragraphs 1.45 to 1.59), senior managers need to demonstrate leadership and need to take corrective measures.

## Communication of language of service requirements

- 1.36 We found that Canada Post communicates language of service requirements to employees responsible for corporate outlets and to dealer outlets. However, this communication does not necessarily translate into full provision of bilingual services in designated outlets.

### **Canada Post informs its employees of requirements**

- 1.37 Canada Post uses several mechanisms to make managers and employees aware of, or to remind them of, language of service requirements. In 2001, the Corporation distributed to all bilingual outlets the brochure "You Make a Difference", which showed bilingual outlets how to let customers know they can receive services in either language. In 2002 and again in 2003, a reminder was sent to all designated bilingual outlets.
- 1.38 As well, the Corporation makes new employees aware of language of service requirements. This includes providing official languages pamphlets to those who will be serving the public, putting material on the Corporation's intranet site and assessing employees' language capabilities for bilingual positions to which they apply. Finally, as part of new Corporation monitoring mechanisms, official languages requirements related to service to the public are part of the review process for bilingual postal outlets, which reinforces the importance of this issue to Corporation employees and managers.

## **Exhibit 3 – Language Clause in Dealership Agreement and Related Standards**

### **Language Clause**

After receipt of written notices to that effect from the Corporation, provide services to the customers of the Postal Outlet in both official languages of Canada when, in the opinion of the Corporation, bilingual services are warranted, and do so in accordance with standards specified from time to time by the Corporation.

### **Standards**

As a retailer operating a designated bilingual site and under the terms of your Dealership Agreement, you are required to follow Canada Post Corporation's Official Languages Policy to provide bilingual services as follows:

#### **Service**

1. The postal outlet must be staffed with sufficient bilingual and fully trained personnel so that customers can be served promptly in their preferred official language throughout all business hours. This applies not only to counter service but also to postal telephone enquiries.
2. No customer should have to request service in the other official language. Bilingual services must always be readily available.
3. Service at the postal counter must always be actively offered in both official languages by displaying at all times the active offer sign, and by addressing customers with a bilingual greeting.

#### **Internal and External Signage**

1. All signs pertaining to postal products or services including posters, notices, banners, etc. must be displayed in both official languages with equal prominence.

#### **Advertising**

1. All advertising must be in both official languages. When an ad appears in the majority language newspaper, an equivalent ad must appear in the local minority language newspaper. On the other hand, where no minority press exists in a target area in which there is a demand for the service in the minority official language, the advertisement should be placed in the majority press in both official languages.

#### **Printed Material**

1. When pertaining to postal products or services, display and/or distribute posters, brochures, pamphlets, flyers, notices or other printed material in both official languages.

#### **Forms**

1. All forms relating to postal products or services, for customer use or information, must be available in bilingual format or equally displayed in both official languages.

#### **Material from other Federal Institutions**

1. Display and distribute material with equal prominence in both official languages.

Source: Canada Post, Dealership Agreement and Standards

## The dealership agreement clearly states requirements

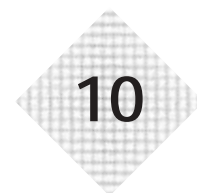
- 1.39 The dealer agreement outlines the various obligations of the Corporation and the dealer. There is a language clause in the dealership agreement that states that if the Corporation determines that the outlet must provide bilingual services, the dealer must do so according to Canada Post's standards. We observed that the language clause and standards are strongly worded and clearly written. Exhibit 3 outlines the language clause and standards in the dealership agreement.
- 1.40 A dealer outlet may be designated bilingual when an initial five-year agreement is signed, or it may become designated bilingual in the period after the agreement is signed. If a dealer outlet is designated bilingual it is the contractor's responsibility to recruit and retain employees who can provide services in both official languages throughout all business hours. Dealer outlets receive the same reminders that Corporation personnel receive: brochures, newsletters and other documents. In addition, Canada Post managers responsible for liaison with dealer outlets are a source of information regarding language of service issues.
- 1.41 However, as described in paragraphs 1.45 to 1.59, even regular communication of language of service requirements does not necessarily translate into full provision of bilingual services, not in corporate outlets and even less so in dealer outlets. Canada Post needs to examine how to better communicate this requirement to its employees responsible for corporate outlets and to dealer outlets. It also needs to develop additional mechanisms to ensure compliance.
- 1.42 Recommendation 3. *Canada Post should formally assess its communications mechanisms to identify additional means of conveying to employees responsible for corporate outlets and to dealer outlets, the importance of language of service requirements.***

## Service provided at bilingual postal outlets

- 1.43 Our examination included visits to 64 bilingual outlets in six provinces across Canada. Although there are significantly more bilingual corporate outlets than dealer outlets, we selected a more comparable number of each as the Commissioner has historically received more complaints regarding dealer outlets. We present overall results and results for these two groups separately. Our examination of each outlet included exterior, interior and temporary (such as "back in five minutes" or "out of order") signs, as well as written materials (Canada Post and other federal government documents). It looked at whether services were offered in both languages, and whether services were provided in the minority language (English in Quebec's Eastern

Townships and French elsewhere). For outlets with satellite Access Canada Service Centres, we also examined whether documents and services were available in both languages. Exhibit 4 provides additional detail on the number of outlets visited, and *About the Audit* at the end of the report provides information on the work done.

<b>Exhibit 4 – Postal Outlets Visited</b>			
<b>Province</b>	<b>Corporate Outlets</b>	<b>Dealer Outlets</b>	<b>Total</b>
Nova Scotia	2	4	6
New Brunswick	4	6	10
Quebec – The Eastern Townships	10	1	11
Ontario – Greater Toronto Area	2	4	6
Ontario – Sudbury & North Bay Areas	6	5	11
Saskatchewan	7	3	10
Alberta	7	3	10
<b>Total</b>	<b>38</b>	<b>26</b>	<b>64</b>



1.44 We expected that bilingual postal outlets would offer services (in person, by telephone, on signs, through Canada Post and federal government documents) in both official languages. Overall, we found varied results. While most signs and documents were available in both official languages, less than half of outlets displayed official languages pictograms at or near the counter to let customers know that services were available in both official languages. Only 10 percent of outlets made an in-person verbal active offer of service and only just over half did so over the phone. One in four outlets was unable to provide satisfactory service in the minority language in person, and one in five was unable to do so over the phone.

### **Most outlets displayed bilingual signs and documents**

1.45 All regions performed well with respect to external and internal signs. In general, corporate outlets achieved a higher level of compliance than dealer outlets. This difference was most notable for temporary signs, where 58 percent of corporation outlets displayed all signs in both languages, compared to 29 percent of dealer outlets. There was also some variation by region regarding federal government documentation: 67 percent of Greater Toronto Area outlets displayed federal government documents in both languages compared to 100 percent in several other regions. Our detailed findings are summarized in Exhibit 5.

**Exhibit 5 – Percentage of Postal Outlets Displaying Signage and all Available Documentation in Both Official Languages**

Province	Outlet Visited	Exterior Signage	Interior Signage	Temporary Signage	Canada Post Documentation	Federal Govt. Documentation
Nova Scotia						
Total	6	100%	67%	0%	100%	NA
Corporate Outlets	2	100%	100%	N/A	100%	NA
Dealer Outlets	4	100%	50%	0%	100%	NA
New Brunswick						
Total	10	90%	90%	67%	100%	100%
Corporate Outlets	4	100%	100%	100%	100%	100%
Dealer Outlets	6	83%	83%	60%	100%	100%
Quebec – The Eastern Townships						
Total	11	100%	91%	55%	100%	91%
Corporate Outlets	10	100%	90%	60%	100%	100%
Dealer Outlets	1	100%	100%	0%	100%	0%
Ontario – Greater Toronto Area						
Total	6	100%	83%	50%	100%	67%
Corporate Outlets	2	100%	100%	50%	100%	50%
Dealer Outlets	4	100%	75%	50%	100%	75%
Ontario – Sudbury & North Bay Areas						
Total	11	100%	100%	0%	100%	100%
Corporate Outlets	6	100%	100%	N/A	100%	100%
Dealer Outlets	5	100%	100%	0%	100%	100%
Saskatchewan						
Total	10	100%	100%	40%	100%	100%
Corporate Outlets	7	100%	100%	50%	100%	100%
Dealer Outlets	3	100%	100%	0%	100%	100%
Alberta						
Total	10	100%	90%	33%	100%	100%
Corporate Outlets	7	100%	86%	50%	100%	100%
Dealer Outlets	3	100%	100%	0%	100%	100%
<b>Total</b>	<b>64</b>	<b>98%</b> (62 of 63) (1)	<b>91%</b> (58 of 64)	<b>44%</b> (16 of 36) (2)	<b>100%</b> (62 of 62) (3)	<b>93%</b> (42 of 45) (4)
<b>Corporate Outlets</b>	<b>28</b>	<b>100%</b> (38 of 38)	<b>95%</b> (36 of 38)	<b>58%</b> (11 of 19)	<b>100%</b> (37 of 37)	<b>97%</b> (28 of 29)
<b>Dealer Outlets</b>	<b>36</b>	<b>96%</b> (24 of 25)	<b>85%</b> (22 of 26)	<b>29%</b> (5 of 17)	<b>100%</b> (25 of 25)	<b>88%</b> (14 of 16)

- (1) Total is less than 64 as 1 dealer outlet in NS had no external signage for auditor to assess.
- (2) Total is less than 64 as 2 corporate outlets and 2 dealer outlets in NS, 3 corporate outlets and 1 dealer outlet in NB, 6 corporate outlets and 2 dealer outlets in the Sudbury & North Bay areas, 3 corporate outlets and 2 dealer outlets in SK, and 5 corporate outlets and 2 dealer in Alta did not have any temporary signs on display for auditors to assess.
- (3) Total is less than 64 as 1 dealer outlet in NS had no CP documents on display for auditor to assess and 1 corporate outlet in SK was closed so auditor was unable to ascertain if CP documents were on display.
- (4) Total is less than 64 as 2 corporate outlets and 4 dealer outlets in NS, 3 corporate outlets and 3 dealer outlets in NB, 1 dealer outlet in the Sudbury & North Bay areas, 2 corporate outlets and 1 dealer outlet in SK, and 2 corporate outlets and 1 dealer outlet in AB did not have any federal government documents on display for auditors to assess.

## Few outlets provided a verbal active offer of service

- 1.46 Actively offering services in both official languages means communicating spontaneously and clearly to members of the public that they will receive services of comparable quality in either official language at designated offices or service points. The verbal active offer is important as it is a "trigger" for members of the public to feel comfortable that they can interact with the service representative in the language of their choice.
- 1.47 A key component of Canada Post's active offer is the official languages decal or sticker on the entrance door to the postal outlet and the official languages pictogram at or over the counter. Canada Post provides not one but two notices to customers regarding availability of bilingual services, rather than simply having a pictogram at the counter. Canada Post considers this strategy to be over and above the Treasury Board requirement, and an effective means of further signalling to customers that service in both official languages is available.
- 1.48 Bilingual door decals and counter pictograms. With respect to the official languages decal at the entrance door of outlets, we found variation between corporate outlets and dealer outlets: 89 percent of the former displayed decals, while only 54 percent of the latter did so. The situation was even less positive for official languages pictograms at or near counters. We could locate these pictograms in only 38 percent of corporate outlets. We were able to do so in 54 percent of dealer outlets. It is crucial that these pictograms be displayed so that customers are confident they can receive services in either official language. We observed cases where, because pictograms were not permanently affixed, they had been temporarily put away or otherwise hidden from view.
- 1.49 Canada Post points out that 84 percent of outlets displayed at least one of these reminders. We applaud the Corporation's commitment to signify to customers the availability of service in both languages through the door decal as well as the pictogram, but we regard the display of counter pictograms as crucial as they are situated at the actual point where the service may be provided. The door decal, while innovative, may be missed by customers if the door is already open or if the door has many other decals.
- 1.50 Recommendation 4. *Canada Post should ensure postal outlets comply with its requirement for bilingual door decals and bilingual counter pictograms and it should ensure that its counter pictograms are permanently affixed when feasible where customers may easily see them.***
- 1.51 In-person verbal active offer. Our audit found that, just as in the rest of the federal government, in most cases postal outlets did not provide a verbal active offer of service. In only 10 percent of outlets visited did counter personnel volunteer a bilingual greeting. The only region where we received any verbal active offers was in New Brunswick. In all other regions we received no verbal active offer (see Exhibit 6). An assessment of why New Brunswick had the only instances of an in-person verbal active offer may help the

Corporation devise a strategy for encouraging it across the country. This observation is quite significant as customers who do not receive a verbal active offer are not encouraged to pursue service in their preferred language.

**Exhibit 6 – Percentage of Postal Outlets Displaying Bilingual Services Signs and Providing Bilingual In-Person Verbal Active Offer**

Province	Outlets Visited	Providing In- Person Verbal Active Offer of Service	Official languages decal on entrance door	Official languages pictogram at or over the counter	Official languages decal or official languages pictogram displayed
Nova Scotia					
Total	6	0%	83%	17%	83%
Corporate Outlets	2	0%	100%	0%	100%
Dealer Outlets	4	0%	75%	25%	75%
New Brunswick					
Total	10	60%	70%	80%	100%
Corporate Outlets	4	75%	100%	50%	100%
Dealer Outlets	6	50%	50%	100%	100%
Quebec – The Eastern Townships					
Total	11	0%	82%	45%	91%
Corporate Outlets	10	0%	80%	40%	90%
Dealer Outlets	1	0%	100%	100%	100%
Ontario – Greater Toronto Area					
Total	6	0%	67%	67%	67%
Corporate Outlets	2	0%	100%	100%	100%
Dealer Outlets	4	0%	50%	50%	50%
Ontario – Sudbury & North Bay Areas					
Total	11	0%	64%	64%	82%
Corporate Outlets	6	0%	100%	67%	100%
Dealer Outlets	5	0%	20%	60%	60%
Saskatchewan					
Total	10	0%	78%	22%	78%
Corporate Outlets	7	0%	83%	17%	83%
Dealer Outlets	3	0%	67%	33%	67%
Alberta					
Total	10	0%	80%	10%	80%
Corporate Outlets	7	0%	86%	14%	86%
Dealer Outlets	3	0%	67%	0%	67%
<b>Total</b>	<b>64</b>	<b>10%</b> (6 of 62) (1)	<b>75%</b> (47 of 63) (2)	<b>44%</b> (28 of 63) (2)	<b>84%</b> (53 of 63) (2)
<b>Corporate Outlets</b>	<b>28</b>	<b>8%</b> (3 of 36)	<b>89%</b> (33 of 37)	<b>38%</b> (14 of 37)	<b>92%</b> (34 of 37)
<b>Dealer Outlets</b>	<b>36</b>	<b>12%</b> (3 of 26)	<b>54%</b> (14 of 26)	<b>54%</b> (14 of 26)	<b>73%</b> (19 of 26)

- (1) Total is less than 64 as 1 corporate outlet in SK was unexpectedly closed and in 1 corporate outlet in AB the clerk did not initiate a greeting, so in both cases the in-person active offer of service could not be assessed by the auditor.
- (2) Total is less than 64 as 1 corporate outlet in SK was unexpectedly closed.

1.52 A verbal active offer is not always made over the telephone. Although not satisfactory, we found a higher rate of compliance with the verbal active offer over the telephone. Seventy percent of corporate outlets and 35 percent of dealer outlets provided a verbal active offer over the telephone. There was also variation by region, with 73 percent of outlets in the Sudbury and North Bay areas providing the offer as opposed to 33 percent in Alberta (see Exhibit 7). Again, if no verbal active offer is provided, customers are less likely to pursue service in the official language of their choice.

**1.53 Recommendation 5. *Canada Post should devise a strategy to ensure that bilingual outlets fully comply with the in-person and over-the-telephone verbal active offer requirements.***

1.54 While we were able to find corporate outlet telephone numbers listed in both languages in the telephone directory 91 percent of the time, we could find only 45 percent of bilingual franchise numbers listed in both languages (see Exhibit 7). The Corporation told us that it is considering no longer listing individual postal outlet telephone numbers in directories, instead encouraging the public to use national toll-free telephone numbers to obtain information. Regardless, we feel that listing postal outlets in telephone directories in both languages is a sound means of making the public aware of the location of postal outlets, including bilingual outlets, as well as of providing information to the public.

**1.55 Recommendation 6. *Canada Post should review the manner in which it lists postal outlet telephone numbers in telephone directories in order to make the public aware of those that are designated bilingual.***

**Exhibit 7 – Percentage of Postal Outlets Providing a Verbal Active Offer of Service over the Telephone and Providing Bilingual Telephone Directory Listing**

<b>Province</b>	<b>Outlets Visited</b>	<b>Percentage providing verbal active offer over telephone</b>	<b>Percentage of outlets listing phone number in both official languages in phone directory</b>
Nova Scotia			
Total	6	0%	0%
Corporate Outlets	2	NA	NA
Dealer Outlets	4	0%	0%
New Brunswick			
Total	10	67%	67%
Corporate Outlets	4	75%	100%
Dealer Outlets	6	60%	40%
Quebec – The Eastern Townships			
Total	11	50%	90%
Corporate Outlets	10	50%	90%
Dealer Outlets	1	NA	NA
Ontario – Greater Toronto Area			
Total	6	50%	50%
Corporate Outlets	2	100%	100%
Dealer Outlets	4	25%	25%
Ontario – Sudbury & North Bay Areas			
Total	11	73%	82%
Corporate Outlets	6	100%	100%
Dealer Outlets	5	40%	60%
Saskatchewan			
Total	10	71%	86%
Corporate Outlets	7	80%	80%
Dealer Outlets	3	50%	100%
Alberta			
Total	10	33%	67%
Corporate Outlets	7	50%	83%
Dealer Outlets	3	0%	33%
<b>Total</b>	<b>64</b>	<b>57%</b> (30 of 53) (1)	<b>74%</b> (39 of 53) (1)
<b>Corporate Outlets</b>	<b>28</b>	70% (23 of 33)	91% (30 of 33)
<b>Dealer Outlets</b>	<b>36</b>	35% (7 of 20)	45% (9 of 20)
<p>(1) Total is less than 64 as for 2 corporate outlets and 3 dealer outlets in NS, 1 dealer outlet in NB, 1 dealer outlet in QC, 2 corporate outlets and 1 dealer outlet in SK, and 1 corporate outlet in AB there was no number listed in the telephone directory for the auditors to call to assess service in the minority language.</p>			

## **One of every four bilingual outlets did not provide satisfactory service in the minority language**

- 1.56 We found that 24 percent of bilingual outlets visited could not provide satisfactory in-person services in the minority language. There was significant variation by region. All outlets in Quebec's Eastern Townships were able to provide services in the minority language, while only 50 percent were able to do so in Alberta and Nova Scotia (see Exhibit 8). We observed that areas with higher linguistic minority populations were generally more able to provide services in the minority language.
- 1.57 There was also variation by corporate outlets and dealer outlets: 19 percent of corporate outlets were unable to provide service, compared to 31 percent of dealer outlets. This may be explained by the fact that the Corporation has more direct control over its own outlets than over dealer outlets, and it is more easily able to enforce language of service requirements.
- 1.58 The same variation between corporate versus dealer outlets was observed for service over the telephone. Overall, 19 percent of bilingual outlets were unable to provide satisfactory service in the minority language (12 percent of corporate outlets and 30 percent of dealer outlets). Again, there was variation across regions. For example, 17 percent of outlets in the Greater Toronto Area were not able to provide service over the telephone in the minority language, as opposed to 44 percent of outlets in Alberta (see Exhibit 8).
- 1.59 We feel these findings are quite serious, given that these outlets have been designated bilingual and that customers expect to be served in the language of their choice. Canada Post is obliged to provide services in both languages and must work to ensure that these services are available. Our recommendations to correct these deficiencies are listed in paragraph 1.72.

## **The capacity to deliver bilingual services in corporate outlets needs to be strengthened**

- 1.60 For Canada Post to meet its language of service obligations, it must have the capacity to provide bilingual service at designated outlets, meaning that there are sufficient bilingual personnel so that customers can be served promptly in their preferred official language throughout all business hours. Attaining this capacity, and then maintaining it, requires firm and ongoing commitment.

**Exhibit 8 – Percentage of Postal Outlets Providing Satisfactory or Very Good Service in Minority Language**

<b>Province</b>	<b>Outlets Visited</b>	<b>In-person</b>	<b>Over the Telephone</b>
Nova Scotia			
Total	6	67%	100%
Corporate Outlets	2	50%	NA
Dealer Outlets	4	75%	100%
New Brunswick			
Total	10	80%	89%
Corporate Outlets	4	75%	75%
Dealer Outlets	6	83%	100%
Quebec – The Eastern Townships			
Total	11	100%	90%
Corporate Outlets	10	100%	90%
Dealer Outlets	1	100%	NA
Ontario – Greater Toronto Area			
Total	6	67%	83%
Corporate Outlets	2	100%	100%
Dealer Outlets	4	50%	75%
Ontario – Sudbury & North Bay Areas			
Total	11	91%	82%
Corporate Outlets	6	100%	100%
Dealer Outlets	5	80%	60%
Saskatchewan			
Total	10	67%	86%
Corporate Outlets	7	67%	80%
Dealer Outlets	3	67%	100%
Alberta			
Total	10	50%	56%
Corporate Outlets	7	57%	83%
Dealer Outlets	3	33%	0%
<b>Total</b>	<b>64</b>	<b>76%</b> (48 of 63) (1)	<b>81%</b> (43 of 53) (2)
<b>Corporate Outlets</b>	<b>28</b>	81% (30 of 37)	88% (29 of 33)
<b>Dealer Outlets</b>	<b>36</b>	69% (18 of 26)	70% (14 of 20)
<p>(1) Auditor unable to assess in-person service at 1 corporate outlet in SK as it was unexpectedly closed.</p> <p>(2) Total is less than 64 as for 2 corporate outlets and 3 dealer outlets in NS, 1 dealer outlet in NB, 1 dealer outlet in QC, 2 corporate outlets and 1 dealer outlet in SK, and 1 corporate outlet in AB there was no postal counter phone number listed in the telephone directory for the auditors to call to assess service in the minority language.</p>			

- 1.61 The Corporation has taken some innovative steps to ensure that services are provided in both languages at bilingual corporate outlets. However, it needs to better assess its bilingual capacity at these corporate outlets to determine how many bilingual personnel are assigned to each outlet, and in turn to revisit its scheduling procedures to ensure services in both languages are available. We also observed that Canada Post requires its counter personnel to achieve a level-A proficiency — the lowest level at Canada Post — in their second language. As Canada Post does not require employees to be retested, any slippage in proficiency, in our opinion, results in an inability to provide satisfactory service. While Canada Post considers its level-A designation to be higher than the level-A in the federal public service, we feel that it is not equivalent to a Public Service Commission level-B. The vast majority of positions in the federal public service that involve serving the public in both official languages require a level-B proficiency.
- 1.62 Canada Post is responsible for identifying staffing requirements in its corporate outlets, including identifying requirements for bilingual positions. The Corporation has in place a manual that describes the procedures to follow to determine the language requirements of positions. Although human resources directors should ensure that the manual's procedures are applied correctly, managers in Field Operations are responsible for identifying or reviewing language requirements each time a position is created or becomes vacant and is to be staffed. Further, the manual states that positions involving counter operations require an A-level or basic proficiency.
- 1.63 Postal outlets managed directly by Canada Post are staffed with unionized counter personnel. Staff in rural postal outlets are represented by the Canadian Postmasters and Assistants Association (CPAA). The Canadian Union of Postal Workers (CUPW) represents counter personnel in urban areas. Both of these unions have collective agreements with Canada Post.
- 1.64 The process for dealing with staffing varies according to which union is involved. If a bilingual position or an existing unilingual position designated bilingual in an urban area (represented by CUPW) is to be filled, it is done so on a non-imperative basis. The successful candidate (if not bilingual) is given the opportunity to learn the second language, with short-term provisions made to provide bilingual service until the person becomes bilingual. Canada Post told us that for urban outlets, under the terms of the existing collective agreement with CUPW seniority is the key consideration in filling positions, and this takes precedence over language skills. If this situation occurs in a rural area (represented by CPAA), staffing is bilingual imperative. A bilingual person must be found to occupy the position. Some Field Operations managers told us that, in practice, it is hard to find bilingual staff.

- 1.65 For corporate outlets there are several issues that affect their ability to offer bilingual services at all times, such as the need for bilingual personnel to take sick leave, training or vacation leave. As well, turnover is an issue, particularly when an employee is sent on language training to meet the language requirements of a position, only to transfer to another position afterwards.
- 1.66 Canada Post has taken some innovative steps to deal with the issue. Operations management in the Greater Toronto Area, for example, told us they have created a pool of bilingual counter personnel who can be shifted to a bilingual corporate outlet that has a bilingual employee absent due to vacation, sickness or training. This pool concept has just been recently introduced, and the Corporation needs to determine its effectiveness.
- 1.67 The Corporation has worked with CUPW to improve language of service in bilingual outlets as part of its current collective agreement. Under the agreement, employees who receive language training to meet the requirements of a position at the Corporation's expense are required to occupy the position for a minimum of 12 months. This provision was not in the previous collective agreement, and while it is a step in the right direction, it is still not enough to ensure that bilingual positions are staffed on an imperative basis.
- 1.68 The Corporation also offers its employees opportunities to improve their second language. Employees may be eligible for intensive training and may take other courses for which the Corporation will reimburse tuition. The Corporation has a standing offer with three language schools to provide various forms of training to its employees. The Corporation is developing a new system to better track language training and its results among employees.
- 1.69 Finally, the Corporation has a new system in place to report its actual bilingual capacity in bilingual corporate outlets. That is, it can say how many bilingual personnel it has assigned to each outlet. We believe this is a necessary first step to allow the Corporation to assess whether it needs a greater number of bilingual personnel in selected bilingual outlets. This in turn would help it design schedules that ensure that bilingual clerks are always at the counter.
- 1.70 However, in the absence of periodic testing of those employees identified as bilingual, the information generated by this system does not allow Canada Post to conclude whether these employees have maintained their proficiency in their second language. Sometimes employees who have been determined to be bilingual may lose this ability over time but remain in a bilingual position. At Canada Post, once a counter person attains a level-A proficiency in the second language, retesting is not required. Canada Post had an external consulting firm complete a comparison between its level-A designation

and the Public Service Commission's level-A designation. The firm concluded that the Corporation's level-A encompassed slightly higher levels of ability than the Commission's level-A. However, it nevertheless indicates a relatively low level of language proficiency among Canada Post employees with level-A standing. We regard Canada Post's level-A proficiency to be less than the Public Service Commission's level-B. In fact, very few positions with a level-A proficiency remain in the federal public service. Virtually all positions requiring service to the public in both official languages now require a level-B proficiency. Any slippage in the basic level (level-A) of language proficiency among Canada Post counter personnel, in our opinion, results in an inability to provide satisfactory service. We believe Canada Post should take steps to ensure that the language proficiency of its employees is maintained through periodic retesting.

1.71 This issue is all the more significant given Canada Post's move to provide services at some of its postal outlets on behalf of other federal institutions. For example, Canada Post has entered into a limited pilot agreement with the Passport Office to process passport applications at some postal outlets. The agreement states that counter clerks will assist applicants for passports by accepting their application, ensuring that the application has been filled out in an acceptable manner, that the proper payment is made and that all required supporting documentation has been provided. It also requires that Canada Post provide these services in accordance with the Act and regulations – in other words, offer this service in both languages at bilingual outlets where this service is provided. This indicates to us that a level-A ability is not sufficient to serve the public. Canada Post has also entered into similar agreements with other federal institutions such as Fisheries and Oceans Canada.

**1.72 Recommendation 7. *Canada Post must take immediate steps to assess the bilingual capacity of all designated bilingual corporate postal outlets and to ensure they provide services in both official languages. Canada Post should:***

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

## **Dealer outlets' capacity to deliver bilingual services needs to be strengthened**

- 1.73 Dealer outlets are responsible for recruiting and retaining bilingual employees with the same level of proficiency as corporate outlet personnel and for ensuring that counter personnel can provide services in both official languages during all business hours. While dealers receive initial instruction regarding various aspects of managing a dealer outlet, language of service issues are not explicitly covered. As discussed in paragraphs 1.45 to 1.59, dealer outlets were less likely than corporate outlets to provide services in the minority language.
- 1.74 Canada Post controls dealer outlets through the dealership agreement. As discussed in paragraph 1.39, the language clause and standards in the dealership agreement are strongly worded and clearly written. On occasion, Canada Post sends written notices or warnings to dealer outlets that contravene language requirements. However, Canada Post told us that only one dealer outlet in recent years has had its agreement revoked because of language of service issues.
- 1.75 Some dealer outlet personnel we interviewed felt that Canada Post should provide more active assistance in helping them meet requirements. They referred in particular to the difficulty in recruiting and retaining qualified bilingual clerks. We observed that this may be due in part to the fact that dealer outlet clerks receive considerably lower salaries than Canada Post clerks, and that those hired by dealer outlets may move on to better paying jobs when they find opportunities elsewhere. Canada Post acknowledges this is a recurring issue for dealer outlets, but maintains that the dealership agreement is quite clear regarding language of service requirements.
- 1.76 We understand that once a dealer outlet is established, it is difficult to terminate the agreement and locate another dealer. But the language clause in the dealer agreement is clear, and Canada Post must either enforce the clause or it must provide dealers with more assistance to respect it. A possible solution would be for Canada Post to offer additional guidance or service, perhaps on a cost-recovery basis, to help designated bilingual dealer outlets meet language of service requirements. In particular, it may be difficult for dealer outlet owners to recruit bilingual staff if they themselves are not bilingual, in part because it would be difficult for them to determine if applicants speak the second language adequately. The Corporation could assist in this area by using existing standing offers with language schools to test applicants' second language proficiency. This could be as simple as administering a standardized test to applicants.

**1.77 Recommendation 8. *Canada Post must take immediate steps to ensure that all designated bilingual dealer outlets provide services in both official languages by:***

***A. requiring dealer outlet counter clerks to have the same level of proficiency in their second language as clerks in corporate outlets;***

***B. testing potential dealer outlet employees to determine if they meet language requirements;***

***C. making language of service a component of initial instruction provided to those who sign a dealership agreement; and***

***D. providing assistance to dealer outlets to reach these goals.***

**The list of bilingual outlets is being updated in response to changes necessitated by the 2001 Census**

1.78 The 2001 Census results have led to changes to the list of locations required to provide bilingual services, and the results have required federal institutions, including Canada Post, to update their lists of bilingual points of service. Canada Post has consulted with Treasury Board and is finalizing an updated list of bilingual postal outlets. Treasury Board has stated that offices no longer required to provide bilingual services must continue to do so, to give federal institutions time to consult and consider any necessary adjustments.

1.79 In conjunction with updating the list of postal outlets designated bilingual, Canada Post is also updating its Web site's "postal outlet locator," which allows customers to find the nearest postal outlet offering particular services, whether it be fax service, post office box rentals, or bilingual counter service. We observed that it was difficult to locate bilingual postal outlets using this function. Canada Post indicated that it was aware of technical challenges, and that it was changing the software to improve information provided. In our follow-up to this audit we will examine the postal outlet locator function to assess these improvements.

**Canada Post has committed to obtaining greater input from linguistic minority associations**

1.80 Canada Post told us that once the requirement for providing bilingual postal outlets is established in a given area, it is up to the Corporation to decide where in that area bilingual services are to be provided. Field Operations consider the traffic through individual outlets and the general ease in designating one outlet bilingual as opposed to another. We note that Treasury Board guidelines require consultation with linguistic minority communities.

1.81 In the past there was no formal process for consulting with linguistic minority communities when Canada Post was deciding in which postal outlets to place bilingual services. The process was more informal, and any minority association was free to contact Canada Post to discuss such issues. We also noted some confusion among linguistic minority associations regarding the placement and identification of bilingual outlets. In light of the latest changes necessitated by the 2001 Census, Canada Post is establishing a more formal process for consultations with linguistic minority associations. This process will also provide Canada Post with an opportunity to discuss with associations the range of services that will be available in outlets designated bilingual, given that dealer outlets may provide fewer services than corporate outlets. We are encouraged by this development.

**1.82 Recommendation 9. *Canada Post should undertake formal consultation with linguistic minority associations on a regular basis as part of its process of determining the locations of bilingual postal outlets.***

#### **Satellite Service Canada Access Centres within outlets provided bilingual services**

- 1.83 Service Canada is a government-wide network that provides Canadians with access to government programs and services through face-to-face assistance, printed materials, the Internet and the telephone. There are three types of centres: Full Service and Speciality Access Centres in Human Resources and Skills Development Canada (formerly Human Resources Development Canada) and Canadian Heritage locations, and Satellite Access Centres in Canada Post locations, which provide more limited services. Canada Post operates 156 Satellite Access Centres as part of a Canada-wide network of 223 in-person offices.
- 1.84 As part of our special study, *The Single Window Networks of the Government of Canada* (2003), we examined the Service Canada network. We noted, among other things, that the computer terminal keyboards used at some sites did not display French accent signs. In response, Canada Post reviewed postal outlets with Centres to ensure that all keyboards are in compliance with the standard.
- 1.85 Human Resources and Skills Development Canada is responsible for managing the network. It has a Memorandum of Understanding with Canada Post outlining requirements for implementing Service Canada in Canada Post satellite access centres. Canada Post is responsible for ensuring that core services comply with the *Official Languages Act*, the Official Languages Regulations and Treasury Board policies on official languages. Canada Post is also responsible for providing basic one-on-one assistance from on-site personnel and for actively monitoring the activities of each centre to ensure compliance with requirements.

- 1.86 In our sample of 64 postal outlets, nine had Satellite Access Centres. We examined these nine to determine whether the written information, including signs, was available in both languages, if the keyboards were bilingual, and if in-person service was available in the minority language. Our findings are summarized in Exhibit 9. We found that written information in both languages was available in all but one case and that keyboards were bilingual in all centres. We did note that in-person service was not always available in the minority language when we asked for assistance, although in some cases this was because bilingual personnel were otherwise occupied.
- 1.87 Our observation with respect to in-person service points to the importance of Canada Post ensuring that satellite Service Canada Access Centres are situated in outlets that are able to provide satisfactory services in both languages. We feel this is an important variable when determining where to place Access Centres. The current Memorandum of Understanding does not specify where Satellite Access Centres are to be located. It is to expire at the end of March 2004. Therefore, the opportunity presents itself for the Corporation to discuss with Human Resources and Skills Development Canada the importance of placing Satellite Access Centres in bilingual outlets.
- 1.88 Recommendation 10. *In determining where to place Satellite Access Centres, Canada Post should, in consultation with Human Resources and Skills Development Canada, consider placing them in functioning bilingual outlets to ensure that in-person service is available in both official languages.***

**Exhibit 9** – Service provided at Satellite Service Canada Access Centres

Service	Number	Percentage of Centres Providing Service
Written information available in both languages	8 of 9	89
Bilingual keyboard	9 of 9	100
In-person service available in the minority language	5 of 8 (1)	63

(1) Unable to assess in-person service at one centre in AB as personnel were occupied serving other customers.

## Managing the level of service

- 1.89 Systems and procedures to measure and report on performance are an important part of an organization's management and accountability regime. It is through measuring and reporting performance — and taking action to improve it — that an organization demonstrates its commitment to improvement. One can measure performance continually or regularly, or one can do it periodically. Examples of the former include systems or mechanisms that measure performance continually every day, month or year. Examples of the latter include audits, program evaluations and studies.

### **Systems and procedures are in place to monitor compliance**

- 1.90 Canada Post has mechanisms to measure or monitor adherence to language of service requirements at outlets designated bilingual. These include the Corporation's new Sales Performance Review Checklist, its Mystery Shopper Program, and various one-off initiatives including a number of surveys and a 2002 internal audit. While these mechanisms are new and will need to be strengthened, together, these mechanisms constitute an adequate framework to monitor compliance.

### **An internal audit of bilingual outlets was completed in 2002**

- 1.91 In 2001, the Manager, Official Languages at Canada Post asked the Corporation's internal audit unit to review compliance with the *Official Languages Act* within both corporately owned and dealer outlets. The audit reviewed how Canada Post assesses outlet compliance and how it applies official languages requirements in postal outlets, doing so through telephone surveys of 138 designated bilingual outlets across the country and site visits to 40 outlets in the National Capital Region.
- 1.92 The audit was reported in 2002. It found that only one of 40 outlets displayed the active offer of bilingual service sign and none of the outlets visited greeted the customer in a bilingual format. In terms of offering bilingual services to customers, 88 percent of corporate outlets were able to provide service in the minority language, as opposed to 74 percent of dealer outlets. Eighty-eight percent of corporate outlets provided Canada Post displays and materials in both languages, compared with 87 percent of dealer outlets. With respect to availability of bilingual telephone service, 43 percent of corporate outlets and 17 percent of dealer outlets made a bilingual offer. Eighty-eight percent of corporate outlets and 69 percent of dealer outlets provided service over the telephone in the minority language.
- 1.93 The audit noted that although retail business managers did assess compliance with official languages requirements in bilingual outlets, they did so in only a limited number of outlets. There was a requirement to check availability of bilingual staff and adequate

bilingual telephone service, but these assessments focused mainly on availability of displays and printed material in both official languages. The audit concluded that the system of internal control was not fully acceptable, with a number of significant deficiencies.

- 1.94 The audit recommended that Field Operations remind bilingual outlets of language of service requirements; develop bilingual service performance standards against which outlet compliance should be reported annually; enhance assessment tools to provide a more effective measure of the provision of bilingual services; and include in the Mystery Shopper Program an assessment of service in the minority language. In its July 2003 follow-up report the audit unit concluded that appropriate action had been taken in response to the recommendations.
- 1.95 We were encouraged to learn that the Corporation's internal audit group has recently taken steps to strengthen its presence across the country. In early 2004 it established teams of auditors in each regional office. The audit group is finalizing a plan for the regional audit teams, which will include reviewing the performance of individual postal outlets. Language of service issues will be included in audits of outlets designated bilingual. In our follow-up we will examine the work done by these new units with respect to official languages.

### **Sales Performance Review Checklist collects data on bilingual outlets**

- 1.96 In May 2003, Canada Post implemented a national system to collect data on postal outlets, called the Sales Performance Review Checklist. It aims to help Canada Post outlets continually improve image, merchandising and sales. Once yearly, responsible territorial managers must complete the checklist for all outlets across the country. There are more than 70 criteria, for which outlets are graded a pass/fail/not applicable score for each.
- 1.97 For outlets designated bilingual, the checklist includes three criteria against which they are assessed (see Exhibit 10). For 2003, the checklist was completed for 78 percent of bilingual outlets. For bilingual outlets reviewed, Canada Post reported that 88 percent met the first criterion, 85 percent met the second criterion and 87 met the third criterion. The Corporation told us that outlets' performance against these three criteria is sometimes assessed generally rather than being monitored directly. That is, in situations where managers conducting reviews are not in a position to directly observe service to linguistic minority customers, the managers may make general observations, and this may explain why the Corporation's findings are more positive than ours. The Corporation should consider either revising the wording of these criteria to reflect how the assessments may be done or changing the process so that responsible territorial managers are in a position to more completely assess outlets' performance in this area.

### **Exhibit 10 : Language of Service Criteria Included in Canada Post's Sales Performance Review Checklist**

1. The two official languages symbols are clearly and permanently displayed:
  - The electrostatic door decal at the front entrance.
  - The metal pictogram at / near the counter.
2. All customers are always greeted in both official languages ("Hello / Bonjour") on the telephone and at the counter.
3. Fully bilingual staff are always available to serve every customer (counter & telephone at the counter) in the official language of their choice.

Source: Sales Performance Review Checklist (Version 1.0 – May 2002)

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1.98 The Corporation does take corrective action for outlets where any of these criteria are not met. This action takes the form of discussions between the corporate outlet or dealer outlet manager and the Canada Post manager responsible for the area in which the outlet is located. This process is informal, so we encourage the Corporation to consider a more formal process for establishing and monitoring corrective action, as this will help it better monitor improvement over time, especially in cases where there are personnel changes. We also encourage the Corporation to ensure that all bilingual outlets are reviewed under this checklist in 2004.

**1.99 Recommendation 11: *As part of its Sales Performance Review process, Canada Post should revise its criteria on language of service to reflect how assessments are done, and it should formalize both its procedures for taking corrective action and for monitoring its implementation.***

#### **The Mystery Shopper Program assesses service at bilingual outlets**

1.100 Businesses use mystery shopper programs to increase revenues, strengthen customer relationships and maximize front-line service. Mystery shoppers anonymously and objectively observe and document the quality of service a business provides on any given day. Canada Post has used mystery shoppers twice annually, since 1996. In 2001, mystery shoppers began looking at signage on availability of bilingual services, the verbal active offer and the quality of service provided in the minority official language. Canada Post told us that mystery shoppers use the minority language in bilingual outlets. Typically, each time the program is conducted, approximately 65 of 500 outlets visited are bilingual.

1.101 The latest results (fall 2003) were that 81 percent of outlets clearly displayed bilingual signs, 22 percent provided a verbal active offer in both languages, and 78 percent provided service in the minority language. It is noteworthy that the Mystery Shopper Program findings on bilingual signs are more positive than ours; this may point to the importance of ensuring that pictograms on or near the counter are permanently affixed. We noted several instances in our visits to postal outlets where outlets had pictograms under the counter or otherwise out of plain view. The findings regarding the verbal active offer and service provided are comparable to ours. It is the responsibility of general managers in the regions to implement corrective actions necessitated by mystery shopper results; the unit within the Corporation that is responsible for the Mystery Shopper Program is not responsible for monitoring the implementation of corrective actions.

1.102 It is our view that while the three questions included in the Mystery Shopper Program alone do not allow Canada Post to conclude whether language of service requirements are met, the Mystery Shopper Program is nevertheless a valuable tool for identifying issues regarding language of service to the public. We feel that all bilingual outlets would benefit from this review, and we encourage the Corporation to continue to use this tool to assess language of service in bilingual outlets.

**1.103 Recommendation 12. *Canada Post should ensure that all bilingual outlets are assessed using the Mystery Shopper Program over a reasonable period of time and that corrective actions are formally monitored.***

### **The results of monitoring are used to improve language of service**

1.104 As described in paragraphs 1.91 to 1.102, the Corporation does have systems and procedures in place to monitor compliance and it does use the results of its monitoring systems to improve service at bilingual outlets. In addition, outlets' performance is reported to Operations managers, as well as to senior managers. These systems are relatively new at Canada Post, and the Corporation may need to revise them while streamlining them. As well, it is important for the Corporation to monitor whether deficiencies noted are rectified and to ensure that formal action plans to correct deficiencies are formal as opposed to informal. This will make monitoring improvements easier and mitigate the impact of personnel changes.

**1.105 Recommendation 13. *Canada Post should continue to formally monitor the service provided by bilingual postal outlets, ensure that action plans to correct deficiencies are formal, and measure whether deficiencies noted during monitoring are fully corrected.***

## **Language of service issues are not an element of managers' annual appraisal process**

1.106 We found that issues related to official languages in general, including language of service, are not part of the formal appraisal process for managers. The Corporation uses a detailed appraisal tool to assess its managers' annual performance in several areas. However, no section deals explicitly with official languages or language of service at bilingual outlets since, as the Corporation told us, this was covered under an existing broad category. We nevertheless feel that, for those managers responsible for bilingual outlets, assessing their performance in this area would help establish it as an important priority.

**1.107 Recommendation 14. *Canada Post should make managers' performance in the area of language of service a component of the annual appraisal process.***

# CONCLUSION

- 1.108 In conducting our audit, we sought to determine the extent to which Canada Post ensures that adequate services are provided to the public in clients' choice of official language at bilingual postal outlets.
- 1.109 We observed that senior managers at Canada Post are committed to providing services in both languages at bilingual outlets. This commitment is exhibited through the Corporation's official languages policy, the establishment of a group responsible for official languages and official languages co-ordinators in regional offices, and various mechanisms established to keep senior managers abreast of compliance with its policy. However, a pro-active approach is required to correct longstanding problems.
- 1.110 Canada Post makes considerable effort to communicate language of service requirements to its employees responsible for bilingual postal outlets and to private contractors who manage bilingual dealer outlets. However, this does not always translate into provision of bilingual services.
- 1.111 Our examination of bilingual postal outlets yielded varied results. While the majority of outlets complied with signage and document requirements, aside from the temporary signage requirement, we noted serious deficiencies in displaying the official languages pictograms at or near counters and in providing a verbal active offer in person or over the telephone. We found that one in every four bilingual outlets could not provide satisfactory in-person service in the minority language, and that one in every five outlets could not deliver satisfactory services over the telephone.
- 1.112 We reviewed the systems and procedures Canada Post has in place to ensure that bilingual outlets provide services in both languages. The Corporation completed an internal audit in 2002, and its Sales Performance Review Checklist initiative and Mystery Shopper Program include language of service elements. We conclude that while the Corporation needs to continue strengthening these systems, together these constitute an adequate framework to monitor compliance. In particular, Canada Post needs to look at how it monitors outlets when deficiencies are noted and to ensure that corrective actions are formally monitored.

# *L*IST OF RECOMMENDATIONS AND CANADA POST'S ACTION PLAN

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

The Corporation is currently in the process of revising its corporate policies to make them more user-friendly. We will include a section on monitoring mechanisms and responsibilities in our language of service policy and our official languages program. This will be completed by September 2004.

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

Canada Post will conduct a review of its regional resources dedicated to official languages to ensure they are sufficient to actively promote official languages objectives. This will be completed by December 2004.

In addition, in 2002, we developed a communications strategy to raise employee awareness of the official languages program. The primary objective of this strategy is to increase the visibility of our official languages program. The strategy includes language of service and language of work objectives. We will continue to review and update our communications strategy to ensure that the essence of this recommendation is included, as appropriate.

- 3. Canada Post should formally assess its communications mechanisms to identify additional means of conveying, to employees responsible for corporate outlets and to dealer outlets, the importance of language of service requirements.**

We will continue to inform our counter employees and private sector dealers of their language of service responsibilities through the use of internal publications, promotional material and targeted letters. We will also ask our Communications team to assess the effectiveness of our current communications activities and propose additional means, as appropriate. This will be completed by October 2004.

- 4. Canada Post should ensure that postal outlets comply with its requirement for bilingual door decals and bilingual counter pictograms and it should ensure that its counter pictograms are permanently affixed when feasible where customers may easily see them.**

We will ensure that the counter pictograms are permanently affixed, where feasible. This will be completed by December 2004.

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

We will continue to inform our retail employees and private sector dealers of their language of service responsibilities, including the in-person and over-the-telephone verbal active offer. We will also continue to monitor through the use of our annual Procedural Reviews, quarterly Mystery Shopper Program surveys, internal audits and ad hoc compliance surveys.

In addition, we will increase the frequency and number of Mystery Shops (per Item 7C); formalize our monitoring and corrective action process by including the language of service component in ongoing Internal Audits and quarterly updates (per Item 7C); and implement any required communication activities (per Item 3). This work will be completed by December 2004.

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

Canada Post intends to review its overall strategy with respect to telephone listings of retail outlets in the white pages of public telephone directories. Language requirements will be included as part of this review, which is scheduled to be completed by December 2004. It should also be noted that all Canadians currently have telephone access to Canada Post, in the official language of their choice, by calling the toll free customer service number (1 800 267-1177), which is listed in public telephone directories.

7. **Canada Post must take immediate steps to assess the bilingual capacity of all designated bilingual corporate postal outlets and to ensure they provide services in both official languages. Canada Post should:**
- A. work with the unions to develop solutions that will allow the Corporation to fill bilingual positions on an imperative basis;**
  - B. require its bilingual counter personnel to obtain the equivalent of a federal public service level-B proficiency in their second language to ensure that a satisfactory level of capacity is maintained;**
  - C. retest its bilingual counter personnel every five years to ensure they maintain a proficiency in their second language; and**
  - D. revisit its scheduling procedures to ensure that bilingual counter staff are available during all business hours.**

Canada Post has established a number of mechanisms to monitor compliance in our designated bilingual outlets. These mechanisms include the Sales Performance Reviews, the Mystery Shop Program, internal audits and ad hoc compliance surveys. Such monitoring will continue to take place and corrective measures will be taken, as appropriate. We were pleased to note in your report that you consider that these mechanisms constitute an adequate framework to monitor compliance.

In addition, the following is designed to address the related recommendations:

- A. Counter positions in offices represented by the Canadian Union of Postal Workers (CUPW) are staffed on the basis of seniority, per the collective agreement. Canada Post is therefore not in a position to insist that incumbents of bilingual positions be bilingual prior to their appointment. The current collective agreement expires in January 2007. We will apprise CUPW of this recommendation in May 2004.

It should also be noted that during the last round of negotiations with CUPW, an agreement was reached to improve our ability to provide and maintain services in both official languages at the counters. Under the agreement, employees who receive language training are required to occupy their positions for a minimum of 12 months. This will improve continuity of service.

In addition, the Corporation also has the ability to staff a position with a bilingual employee while a new incumbent is on language training.

B. Positions that require simple and repetitive use of language in routine work situations (such as counter postal transactions) require a relatively basic level of proficiency in both official languages.

Canada Post has defined proficiency levels of A, B, C and P: which represent Basic, Intermediate, Superior and Professional levels. An independent review by a firm of industrial psychologists has confirmed that the Corporation's level A is superior to the level A used in the federal government, and it is deemed to be appropriate for the types of retail counter transactions we routinely perform.

In brief, the level A used in the federal public service requires the ability to ask and answer simple questions and give simple instructions or uncomplicated directions relating to routine work situations.

Canada Post's A level requires incumbents of bilingual positions to have the ability to understand the main idea of a complex request or message, the ability to convey simple messages with all the essential elements, and the ability to convey complex messages while potentially omitting certain essential elements. This implies that the employee will be able to completely process simple information, and understand the essence and some details of complex, non-routine communications.

However, with respect to the sale of products, or the provision of services on behalf of the Department of Fisheries and Oceans and the Passport Office, we will validate the proficiency level to ensure that it meets the communication requirements of such transactions. This will be reviewed by December 2004.

All other bilingual positions at Canada Post that have communication requirements with the public, require Intermediate and Superior proficiency levels.

- C. We will continue to monitor linguistic compliance in our outlets and to take corrective measures, as appropriate. This will continue to be done through the use of our Sales Performance Reviews, quarterly Mystery Shopper Program, internal audits and ad hoc compliance surveys.

We have also increased the frequency and number of the Mystery Shopper visits. Compliance reviews will increase from two to four mystery shop visits annually, beginning this year.

We will also formalize our monitoring process, by including language of service into the ongoing audits that are conducted by our corporate Internal Audit function, and including the follow-up in Internal Audit's quarterly updates. This will be completed by May 2004.

- D. The language of service standards that we have adopted apply to both our corporate and privately operated retail outlets. The standards clearly indicate that bilingual services must be provided throughout all business hours within designated bilingual outlets. We will remind the managers of bilingual outlets, including dealers, to ensure the proper application of these service standards. This will be completed by December 2004 and annually thereafter.

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

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

Canada Post's relationships with its private sector dealers are third party, arm's length contractual relationships, and Canada Post continues to maintain them as such. The dealer agreements contain a strict official languages requirement whereby, if a dealer fails to perform, the dealer can be held in breach of contract. This, in fact, would allow Canada Post to terminate the contract and is therefore already the strongest protection available.

Canada Post will undertake the following action to the extent possible, without jeopardizing the third party, arm's length contractual relationship:

- A. We will advise dealers of the proficiency level that is expected in the second language (consistent with proficiency level at corporate outlets);
- B. We will provide dealers with a list of organizations that provide language testing capabilities, and will re-issue the list to dealers in cases where language of service deficiencies have been identified;
- C. We will reinforce official languages objectives with dealers operating bilingual outlets as they enter into agreements with Canada Post; and
- D. In addition to providing dealers with the information listed above, to help them achieve the expected level of compliance, we will also remind territory managers of the requirement to formalize corrective action plans, as needed; we will strengthen the monitoring and corrective action processes as outlined in Item 10; and we will take action, as prescribed in the contracts, where deemed appropriate, to ensure linguistic compliance.

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

We will consult minority official language associations on the locations of our bilingual postal outlets and will seek their input on our bilingual network. This will be completed by September 2004. There is stability in our bilingual network. However, should significant changes to the network occur, we will seek the views of the minority official language associations, as appropriate.

**10. In determining where to place Satellite Service Canada Access Centres, Canada Post should, in consultation with Human Resources and Skills Development Canada, consider placing them in functioning bilingual outlets to ensure that in-person service is available in both official languages.**

The Service Canada Access Centres agreement between Canada Post and Human Resources Development Canada (now Human Resources and Skills Development Canada) terminated at the end of March 2004 and will not be renewed. Should similar projects be implemented in the future, we will provide information on our bilingual network, to the business partner, as input to their decisions regarding their network of outlets.

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

We will amend the checklist to reflect how assessments are done and to formalize the procedures for taking corrective action and for monitoring its implementation. This will be completed by January 2005.

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

We have increased the frequency of the Mystery Shopper Program from two to four shops annually, beginning this year.

Approximately 60 bilingual outlets will be reviewed each quarter, bringing the total number of outlets mystery shopped per year to a total of about 240 (out of about 775 bilingual outlets). While the outlets are chosen at random, this means that all bilingual outlets could be reviewed over a period of about four years.

We have also increased the spot audits conducted by our Internal Audit function. Quarterly audit reports will also be provided, and corrective measures will be taken, as appropriate.

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

In addition to continuing to monitor compliance through the use of the mechanisms currently in place (Annual Sales Performance Reviews, Mystery Shopper Program, Internal Audits, and ad hoc compliance surveys), we will upgrade those monitoring mechanisms as outlined below.

The Sales Performance Review is the official mechanism to monitor compliance in retail outlets, including linguistic compliance. We will immediately take corrective measures in outlets where deficiencies have been identified in the audit. We will also conduct follow-up audits in such outlets to confirm if the corrective measures have been established. This will be completed by November 2004.

As previously outlined, we have also increased the frequency of the Mystery Shopper Program from two to four shops annually, beginning this year.

In order to formalize our monitoring process, we will also include the language of service component in the ongoing audits that are conducted by our Internal Audit function. A checklist is currently being developed to assist the auditors in measuring performance against the language of service objectives. Quarterly reports will be provided and corrective measures taken, as appropriate. This will be completed by July 2004.

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

The Scorecard used to determine the annual performance and incentive pay of retail managers includes service objectives. Although language criteria are not explicitly mentioned on the Scorecard, they are part of the service objectives included in the Sales Performance Reviews and mystery shopper visits, on which the managers are explicitly measured in their scorecard. Language of service is therefore already a component of the annual appraisal process.

We are encouraged by most of Canada Post's action plan to implement our recommendations, with the exception of its response to recommendations seven, eight and fourteen. To fully demonstrate its commitment to serve the public in both official languages at designated bilingual outlets and to make any significant progress, the Corporation needs to consider innovative ways to meet its language of service obligations.

In responding to our recommendations, Canada Post has placed emphasis on monitoring mechanisms such as the Mystery Shopper Program, the Sales Performance Review Checklist, and audits of postal outlets as the means to ensure that language of service requirements are respected in designated bilingual outlets – both corporate outlets and dealer outlets. More specifically, its action plan places priority on these mechanisms as opposed to focussing on language proficiency of counter personnel and developing new ways of working with dealer outlets. It is therefore paramount that Canada Post ensures that all bilingual outlets are rapidly and regularly examined as part of this approach, and that action plans formulated to address identified shortcomings are formal and corrective actions taken are monitored. In particular, Canada Post must ensure that dealer outlets provide the same level of service as corporate outlets. This will require Canada Post to take innovative steps to assist dealer outlets to attain this level.

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We believe that for Canada Post to fully meet the intent of the *Official Languages Act* in its response to recommendation seven, it needs to revisit how it assesses the bilingual capacity of its bilingual corporate outlets in order to ensure that service in both languages is available at all times and that counter personnel meet customers' needs in either official language. As Canada Post moves towards offering more diverse products and services at its outlets, as well as offering services on behalf of other institutions (the single window approach), it is evident to us that counter personnel need to have the equivalent of a Public Service Commission level-B proficiency and that periodic re-testing must be undertaken to ensure that proficiency is maintained. It is noteworthy that as of April 1, 2004, Treasury Board has adopted new policies and guidelines, one of which makes bilingual imperative staffing the norm and bilingual non-imperative staffing the exception. With a view to respecting the spirit of the recent changes, Canada Post should immediately discuss with the unions representing counter personnel how imperative staffing may be applied in postal outlets.

In considering Canada Post's response to recommendation eight, it is important to note that the Corporation chose to have dealer outlets provide services on its behalf, fully aware that language of service requirements must be respected. The language clause and standards in the dealership agreement are clear. However, Canada Post needs to enforce the clause and standards – which it clearly has not been doing consistently. If Canada Post chooses to continue having dealer outlets provide services on its behalf, we believe that it needs to provide more support to them to fully meet the intent of recommendation eight. We maintain that completely implementing our recommendation would provide to dealer outlets the

assistance they need to meet these requirements, and to provide the same level of service that Canada Post requires of its corporate outlets.

In responding to recommendation fourteen, Canada Post states that managers' performance is assessed in part based on the results of Sales Performance Reviews and the Mystery Shopper Program, and that by extension they are assessed against language of service requirements. However, we believe that managers need to be held clearly accountable for language of service requirements, and that this may be accomplished through making language of service a separate and identifiable component of the annual appraisal process.

We maintain that the full implementation of our 14 recommendations is necessary if Canada Post is to fully meet its obligation to offer services in both official languages at designated bilingual postal outlets.

When we conduct our follow-up, we will be looking for significant improvement in Canada Post's performance. In the meantime, Canada Post needs to prove the approach it has chosen can achieve the needed results.

This report represents the first audit undertaken by the Office of the Commissioner of Official Languages since its audit function was re-established in 2003. The function ceased in the mid-1990s for budgetary reasons, but has been activated, as it is an essential tool for the Commissioner to gather the necessary information to report fully to Parliament on the status of each official language in the affairs of federal institutions. The Office undertakes audits under Section 56 of the *Official Languages Act*, which states that the Commissioner must take all actions and measures to ensure federal institutions are meeting their obligations under the Act. Among other things, the Commissioner has the power to conduct investigations at her own initiative, including doing audits.

## Objectives

The objectives of the audit were to determine whether:

- senior managers at Canada Post Corporation are committed to providing services to the public in both official languages at designated postal outlets;
- Canada Post Corporation has in place appropriate systems and procedures to ensure that its designated postal outlets and designated postal franchises operated by the private sector on behalf of the Corporation provide services in both official languages;
- individual postal outlets that are designated bilingual provide adequate services in both official languages; and
- Canada Post Corporation monitors its postal outlets' and franchises' performance with respect to providing services in both official languages and reports formally on the results of this monitoring.

## Scope and Approach

The audit was conducted at both Canada Post corporate headquarters in Ottawa and in regional offices across the country from November 2003 to March 2004.

Our examination included a review of key Corporation policies, documents and reports. We examined systems and procedures that the Corporation has in place to monitor outlets. We interviewed Canada Post senior managers in Ottawa as well as general managers, directors of operations and territorial managers in regions where we visited postal outlets. We also interviewed representatives of the Corporation's official languages group and regional official languages co-ordinators. We consulted with linguistic minority associations in provinces where we undertook fieldwork.

Our examination of corporate and dealer postal outlets included those in urban as well as rural areas. We visited outlets in New Brunswick, Nova Scotia, Quebec's Eastern Townships, the Greater Toronto Area, the Sudbury and North Bay areas of Ontario, Saskatchewan and Alberta. We did not undertake field work in the National Capital Region as Canada Post's internal audit group conducted fieldwork there in 2002, and we did not visit postal outlets in British Columbia as they were part of a recent review by Treasury Board of French language services available in that province.

We reviewed exterior, interior and temporary signs (e.g., "back in five minutes" and "out of order") to determine if requirements were respected. We also checked to see if printed materials pertaining to postal products or services, Canada Post forms and material from other federal institutions were available in both languages and displayed with equal prominence. It must be noted that we did not assess whether outlets displayed all documents the Corporation requires them to have available. Rather, we determined whether signs and forms on display were available in both languages. As well, our examination was restricted to Canada Post and federal government documentation. We did not examine other documents on display. Finally, we did not compare the range of bilingual products and services – general services (fax, photocopy, post office boxes), financial services or philatelic products – offered in corporate outlets versus those offered in dealer outlets, although we plan to do so in our follow-up.

## Criteria

We expected the following:

- the Corporation has in place an official languages policy or guidelines regarding service to the public, and that these are approved by senior managers and are consistent with the *Official Languages Act* and Regulations;
- senior managers are regularly informed of the Corporation's compliance with its policy or guidelines and direct necessary actions to ensure compliance;
- the Corporation has designated a person or group to ensure that official language requirements are respected and that this person or group has the capacity to do so;
- the Corporation effectively communicates official language requirements both internally to those employees operating its outlets and externally to contractors operating postal outlets on its behalf;
- the Corporation has appropriate systems and procedures in place to monitor whether the public is served in its language of choice at postal outlets designated bilingual;

- the Corporation ensures that postal outlets designated bilingual have the capacity to offer services in both official languages;
- bilingual postal outlets offer services (in person, by telephone, by signs, through written communications and at satellite Service Canada access centres) in both official languages;
- the Corporation monitors whether services are offered and delivered in both official languages at postal outlets designated bilingual, and whether such services are of acceptable quality; and
- the results of monitoring are used in managing quality of service, in reporting performance, and in the performance appraisals of responsible managers.

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