



# Compliance Audit on GNWT French Communications in the Health Sector

## Final Report

June 2021

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## Background

In 1984, the Government of the Northwest Territories (GNWT) adopted the *Official Languages Act (OLA)*, which recognized official language rights in the Northwest Territories (NWT) and provided official language status to English, French, and nine Indigenous languages.

In 2015, in response to a common desire from the GNWT and the Francophone community for an ongoing assessment of the implementation of the Strategic Plan 2013-2018, the Francophone Affairs Secretariat (the Secretariat) commissioned the development of the first Monitoring, Evaluation and Accountability Plan 2015 (MEA Plan 2015). In 2017-2018, an evaluation of the Strategic Plan 2013-2018 and an audit of GNWT French language communications and services were conducted by a third-party contractor. The purpose of those activities was to determine the overall success and value of the Strategic Plan 2013-2018, and to inform the redevelopment of the next five-year Strategic Plan on French Language Communications and Services 2018-2023 (Strategic Plan 2018-2023). One of the key findings was that the GNWT's monitoring, reporting and evaluation capacity was limited, and that the initial MEA Plan 2015 has only been partially implemented<sup>1</sup>.

To address this finding the GNWT decided to build capacity by establishing a new position in charge of monitoring and evaluating French language communications and services. The French Language Monitoring and Evaluation Advisor position was created, and eventually staffed in April 2019. In 2019-2020, the MEA Plan 2015 was updated into the Monitoring, Evaluation and Accountability Plan 2020 (MEA Plan 2020) by the Secretariat, in partnership with the Planning, Research and Evaluation division of the Department of Education, Culture and Employment (ECE) and the Management Board Secretariat of the Department of Finance.

Following the results of the first Francophone Community Satisfaction Survey 2019-2020, it was made clear by the Francophone community that Health and Wellness is a priority when it comes to accessing communications and services in French. Therefore, it was decided that the first compliance audit would focus on this sector. Due to COVID-19, the Secretariat's recent audit focused on communications in order not to burden the GNWT health services' resources during a global pandemic. The audit of communications refers to reviewing the websites and Facebook pages. The Secretariat plans to audit services at an opportune time.

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<sup>1</sup> Government of the Northwest Territories. *Response to Recommendations from the Evaluation of Strategic Plan on French Language Communications and Services*, p.3.

## Objectives

The objective of the compliance audits is twofold. First, it aims to determine if the Standards for French Communications and Services are being adhered to. Second, the results of the compliance audits will guide and assist GNWT institutions in improving their French language communications and services to the public.

The emphasis on the Strategic Plan 2018-2023 renewed focus was on accountability, monitoring and evaluation, and engagement with the Francophone community to further improve GNWT French Language communications and services. Guideline 5 includes provisions for systematic compliance audits to be carried out on a regular basis. Those audits may concentrate on a specific issue advanced by the Francophone community or underlined by the members of the French Language Services Coordinators Committee.



## Scope

The scope of this compliance audit targets three (3) websites and three (3) Facebook pages related to the NWT's health sector. All sites and respective websites are as follows:

1. **Department of Health and Social Services (DHSS) Website**  
[www.hss.gov.nt.ca](http://www.hss.gov.nt.ca)
2. **Northwest Territories Health and Social Services Authority (NTHSSA) Website**  
[www.nthssa.ca](http://www.nthssa.ca)
3. **GNWT's Response to COVID-19 Website**  
[www.gov.nt.ca/covid-19](http://www.gov.nt.ca/covid-19)
4. **Government of the Northwest Territories / Gouvernement des Territoires du Nord-Ouest (GNWT/GTNO) Facebook Pages (managed by Corporate Communications)**  
[www.facebook.com/yourGNWT](http://www.facebook.com/yourGNWT) [www.facebook.com/votreGTNO](http://www.facebook.com/votreGTNO)
5. **Northwest Territories Health and Social Services Authority (NTHSSA) / Administration des services de santé et des services sociaux des TNO (NTHSSA/ASTNO) Facebook page**  
[www.facebook.com/NTHSSA](http://www.facebook.com/NTHSSA)  
[www.facebook.com/ASTNO2](http://www.facebook.com/ASTNO2)
6. **Hay River Health and Social Services Authority (HRHSSA) Facebook Page**  
[www.facebook.com/Hay-River-Regional-Health-Centre-1454565548205248](http://www.facebook.com/Hay-River-Regional-Health-Centre-1454565548205248)

The following elements are excluded from the scope:

- Links leading to external websites or written instruments created by external organizations (e.g. Government of Canada).
- Links or sections directing to GNWT websites that are not health related (i.e. Newsroom tab that is under Executive and Indigenous Affairs' authority).
- Publications issued before 2018.
- Equivalency of content will be assessed; however, this current audit did not evaluate quality of translation.
- Written instruments and web sections not intended for the public.
- Web sections or written instruments clearly targeting communities that are not communities of significant demand for French.
- It was not possible to audit the simultaneousness of web postings.

[Appendix A](#) provides the detailed list of sections of websites and Facebook pages that were audited.

The review of websites and Facebook pages was performed between February 1st and 19th, 2021. Screenshots were made to document the non-compliance with the Standards. The audit reflects the situation that prevailed at that time. The examples provided may have been edited since.

## Methodology

This audit was carried out internally by the Secretariat, in consultation with the GNWT Internal Audit Bureau (IAB) and the Planning, Research and Evaluation division of the Department of Education, Culture and Employment.

## Audit Procedures

This audit was a systematic review of web contents and Facebook posts. Our systematic review included the following:

- Employing a subject matter expert in French language who can assess what was proper French version.
- Comparing English and French versions of web content and Facebook posts to evaluate equivalency and compliance to standards.
- Documenting our findings (compliance or non-compliance) by making notes, taking screenshots, establishing a list of pages that will need revision.
- Collaborating with other subject matter experts – e.g., ECE Planning, Research and Evaluation Division and IAB.

## Audit Criteria

The following evaluation criteria were used to determine the level of communications compliance. They are based on the French Communications and Services Standards 3.1, adopted in September 2019<sup>2</sup>. The Government institutions included in this audit were assessed based only on indicators that applied to their specific situation. The criteria and descriptions are explained below:

### **1. Content of the website is translated and comparable in quality and content in both French and English**

According to the Standards, the contents of most government institution websites need to be translated and posted in both French and English<sup>3</sup>. The web pages in French mirror the English perfectly. The French content is the same as the one in English (text is translated and presented in the same order as the English original version, no paragraphs are missing, the information is presented in the same order). Also, the French pages showcase the same links as the ones on the English page.

### **2. Written instruments (forms, brochures, etc.) intended for the public should be represented on both English and French websites**

The written instruments are posted on websites in both English and French.

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<sup>2</sup> Francophone Affairs Secretariat, GNWT Standards for French Communications and Services, Yellowknife, 2019.

<sup>3</sup> Francophone Affairs Secretariat, GNWT Standards for French Communications and Services, Yellowknife, 2018, p. 25.

**3. French and English fonts are of equal prominence**

The size of the fonts is the same in English and French.

**4. French communications intended for the public are easily accessible**

All written instruments are easily accessible, either by a keyword search, clicking on the “Français” tab on the main menu or clicking on a link on the English web page.

**5. All videos intended for the general public must be available in both French and English**

The evaluation measured whether the videos on the website were produced completely in French; the graphic elements translated and identical to the English version; and the voices were clear and completely understandable.

In general, French Communication Standards state that the preferred French versions for videos, which the GNWT website should contain, is dubbed rather than subtitled. Dubbing produces a better quality of communication than subtitles. The graphics should also be translated in French and the quality of voices should be clear and understandable.

**6. Social media content is available in French and English**

Facebook posts are translated to French.

**7. Social media content is posted simultaneously in French and English**

The posts in English and French should be within a time window of less than five (5) minutes.

**8. Any online comments in French must be answered in French**

Comments and questions in French on GNWT social media must be answered in French, in a timely manner.

**9. Information from a 3rd party that is acting on behalf of the GNWT should be available in French**

Where the public is directed from GNWT web or social media pages to forms or a website or any other written instruments from 3rd party organizations acting on behalf of the GNWT, they are translated to French.

## Calculation of the Compliance Rate

For the purpose of this report, the compliance rate is defined as the conformity of communications instruments issued by departments with Standards for French.

Each indicator was graded on a scale from 1 to 5, with 1 being a fail, 3 being the passing mark and 5 being excellent. The scores were then converted to reflect the weight that their respective categories held, based on the risk assessment. Each department’s performance was only assessed on the content available; departments were not penalized if the elements of a category could not be found and therefore could not be assessed.

Each web page was marked according to the content that could be found on the page; for example a simple web page would be given a mark under category A (Content of the website is translated and

comparable in quality and content in both French and English). Whereas a web page that included a video would be given two separate marks for the same page, one under category A and one under category E (All videos intended for the general public must be available in both French and English). Documents found under the resources section were given individual marks under categories B (Written instruments [forms, brochures, etc.] intended for the public should be represented on both English and French websites) and C (French and English fonts are of equal prominence). Documents were only given a mark under category C if available in French; this way the document would not fail twice.

Each individual Facebook post was marked according to the criteria found under sections F (Social media content is available in French and English) and G (Social media content is posted simultaneously in French and English). Posts were only given a mark under category G if available in French; this way the post would not fail twice.



## Risk Assessment

A risk assessment was performed to identify and evaluate the GNWT Health Sector’s vulnerability to having non-compliance with the Standards on its website and social media. Our assessment identified the five risk events that are common and basic to the five government entities under review. We also rated each risk event based on their impact and likelihood:

	Risk/Events	Risk Rating
<b>R1</b>	The contents of the websites, written instruments, videos and social media posts intended for public use are not translated to French.	High
<b>R2</b>	The French translations of the websites or written instruments are not comparable in quality and prominence to their English counterparts.	Medium
<b>R3</b>	Access to equivalent French web pages is difficult.	High
<b>R4</b>	3rd party information provided on behalf of GNWT is not translated in French.	Medium
<b>R5</b>	There is lower compliance to language standards due to the uniqueness of the pandemic situation (emergency situation).	Medium

The details of our risk assessment for the five entities we examined, can be found in:

- COVID-19 Secretariat ([Appendix C](#))
- Northwest Territories Health and Social Services Authority ([Appendix D](#))
- Department of Health and Social Services ([Appendix E](#))
- Government of the Northwest Territories Facebook page ([Appendix F](#))
- Hay River Health and Social Services Authority Facebook page ([Appendix G](#))

The model of Risk Assessment Heat Map that we used to determine the likelihood and impact of the above risk events can be found in [Appendix J](#).

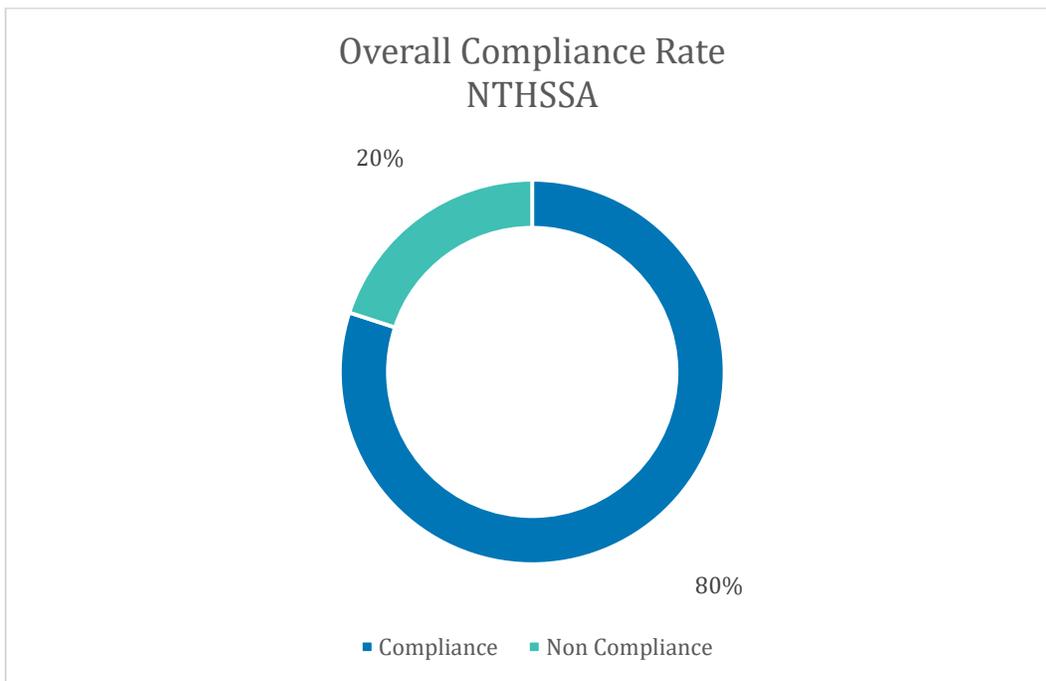


# Key Observations and Recommendations<sup>4</sup>

## Overall Compliance Rate

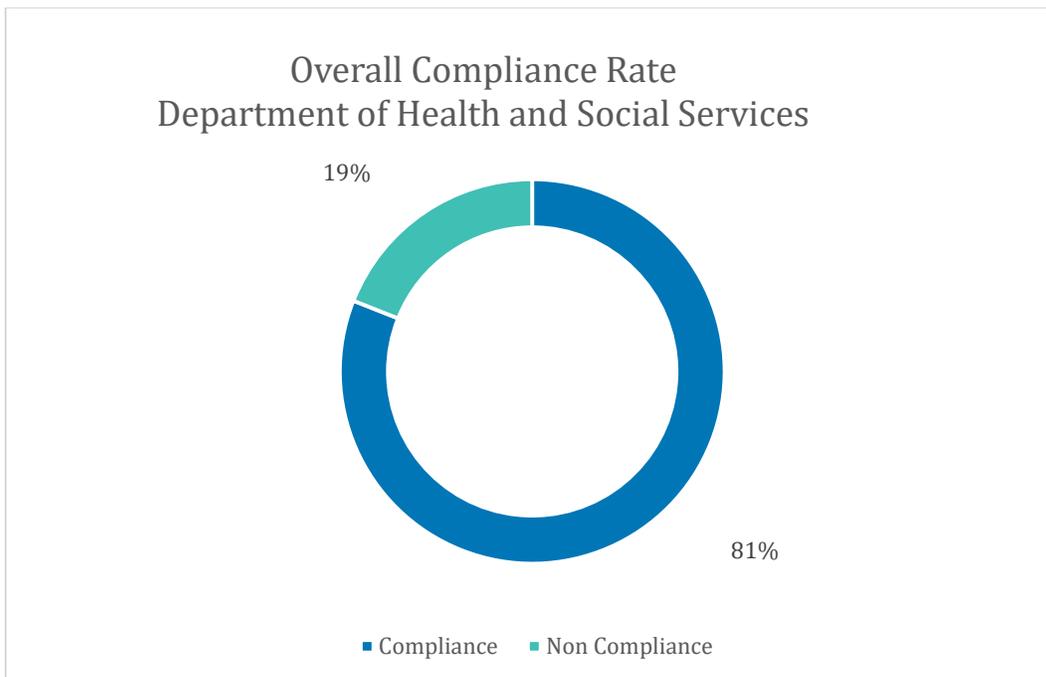
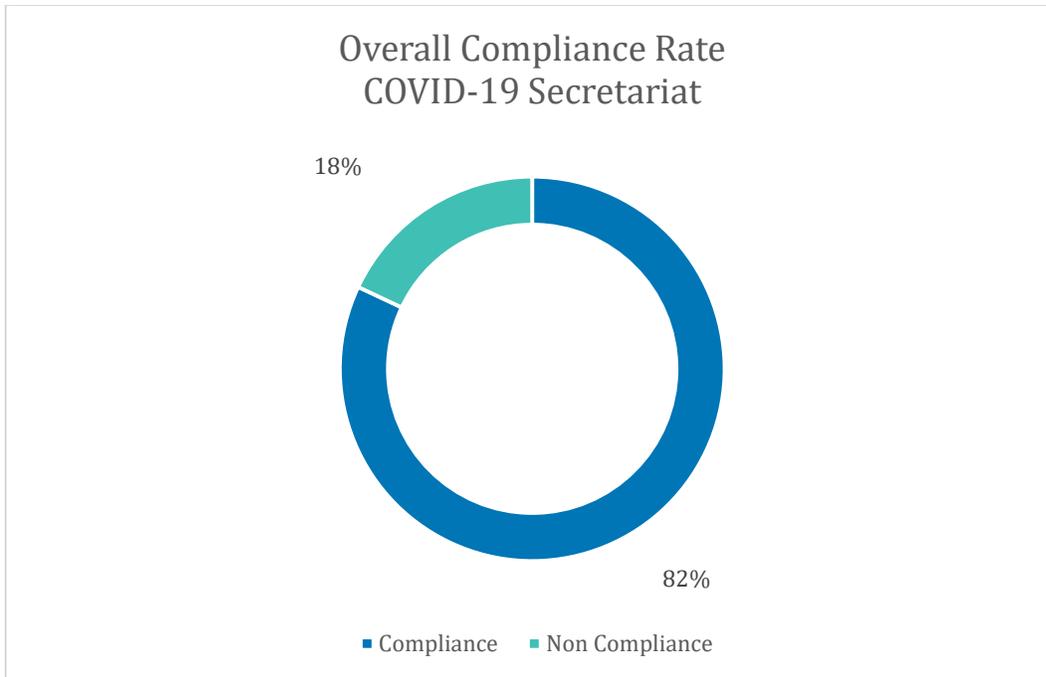
Positive observations and opportunities for improvement were noted throughout the audit. Each observation is summarized below. However, a comprehensive catalogue of the findings, elements, and pages that need to be reviewed has been prepared for each institution to help them make the edits required once the audit is completed. This information will be distributed directly to the communications teams and French Language Service Coordinators of the government institutions targeted by the audit. Those files include a comprehensive list with notes and screenshots of the edits that were required. The summary of the final marks can be found in [Appendix I](#).

One of the major findings of this audit was that the overall compliance rate of NTHSSA<sup>5</sup>, the COVID-19 Secretariat, and the Department of Health and Social Services was high. Those institutions got 80%, 82%, and 81% respectively, meaning that they are compliant with Standards most of the time. Those percentages were calculated by adding the scores of all the indicators audited for each department, taking into account the weight of those indicators.

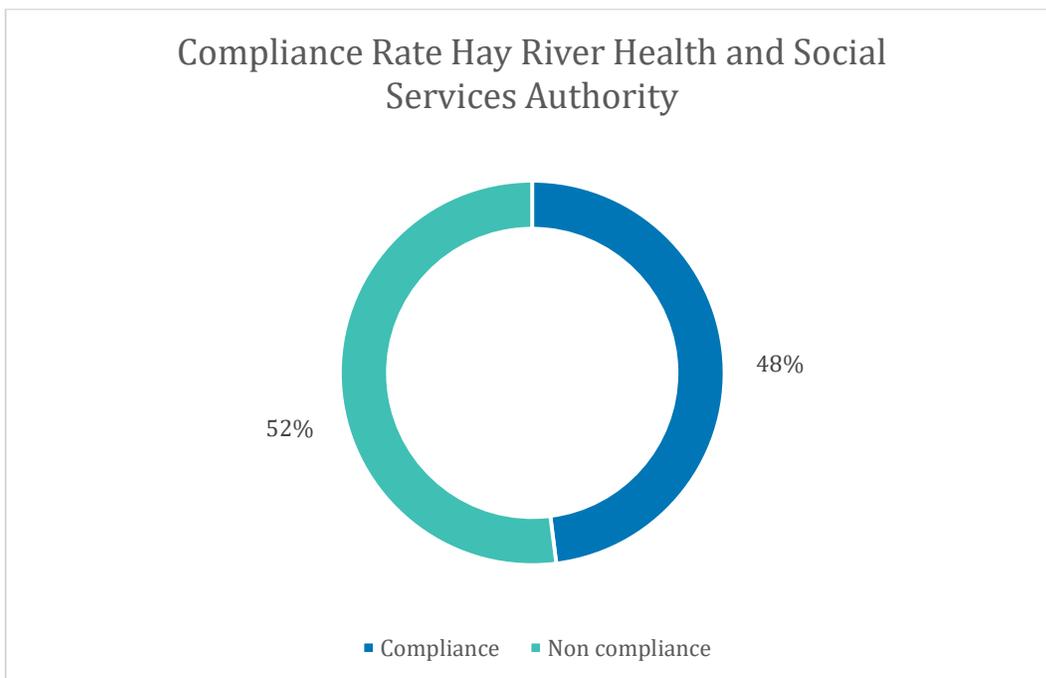
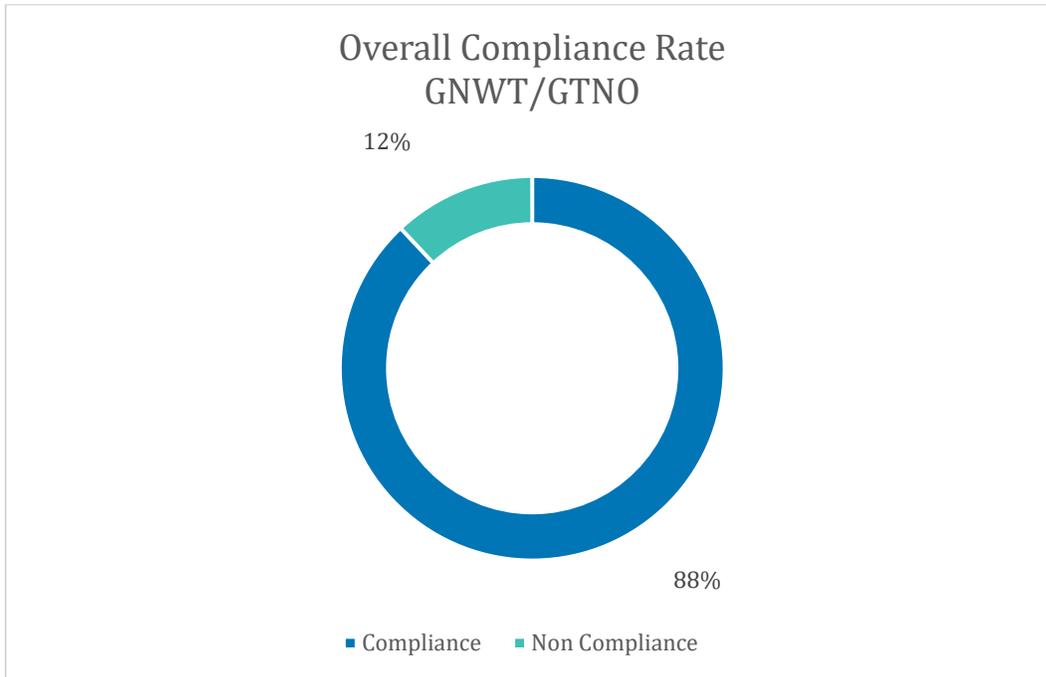


<sup>4</sup> Please refer to [Appendix H](#) for a summary of recommendations.

<sup>5</sup> The compliance rate for NTHSSA includes their website and Facebook page NTHSSA/ASFTNO.



GNWT/GTNO received a total compliance rate of 88% on their Facebook pages, in comparison, HRHSSA reached 48% of compliance.



## Indicator A: Content of the website is translated and comparable in quality and content in both French and English (French Communications and Services Standards section 3.8)

### Key Observations

The contents of government websites, both the main and special programs sites, were translated and posted in both English and French.

### Positive Observations

- The Department of Health and Social Services got an average of 4.39/5; the COVID-19 Secretariat 4.14/5; and NTHSSA 4.07/5, which were all “very good” ratings. The audit confirmed that the vast majority of their revised web pages were translated into French.
- For the most part, the French versions of the web pages were comparable in quality and content to the English version. The noted discrepancies were a few missing words, sentences, or a link or hyperlink.

### Opportunities for Improvement

Although the compliance rate to this standard was high, we have noticed a few issues that will require adjustments in the upcoming months.

- A few missing words or sentences, or a paragraph that has been added in the English version without updating the French version, even if small or infrequent, could misinform the French speaking public.
- Some links directing the readers to other pages were missing on the French pages.
- Some links lead readers to an English page even if an equivalent French page exists.
- French version may contain English words or parts not translated. Some are related to minor technical issues while others are related to website architectural and structural issues.

### Recommendations

#### ***Recommendation A.1:***

*We recommend to the departments that they collaborate with the web team of Information Systems Shared Services (ISSS) to help them address the structural problem of their websites. Departments can submit helpdesk tickets with the list of sections to be checked. Government institutions should also keep in mind that the web team of ISSS can be a helpful resource if they need technical support to improve their websites.*

#### ***Recommendation A.2:***

*We also recommend that the departments and agencies (through their French language*

*coordinators, for instance), coordinate the regular review of their websites to monitor and maintain the quality of French translations.*

***Recommendation A.3:***

*Finally, we encourage departments to analyze and track the usage of websites.*



## Indicator B: Written instruments (forms, brochures) intended for the public should be represented in both English and French (French Communications and Services Standards section 3.8)

### Key Observations

The written instruments intended for the public are represented in both French and English on the web pages.

### Positive Observations

- Most of the brochures, forms, guides, or other publications posted on the websites are bilingual. The Department of Health and Social Services got an average of 4.61/5, the COVID-19 Secretariat got 4.55/5, and NTHSSA received 4.15/5.

### Opportunities for Improvement

- Some publications were not translated to French.
- Some of the titles of the documents translated to French are in English on the French website.

### Recommendation

#### ***Recommendation B.1:***

*To make the written instruments easier to search and more accessible to French speakers, we recommend that French titles be used to name the document on the website. A good practice would be that when the communications officer received the document from the vendor, they should open the document and save it under the name created by the translator.*



## Indicator C: French and English fonts are of equal prominence (French Communications and Services Standards section 3.8).

### Key Observations

This is the indicator that received the highest compliance rate. Equal prominence is an established practice across the publications we audited.

### Positive Observations

- The Department of Health and Social Services and NTHSSA obtained a perfect mark for this indicator (5/5). Their publications are completely compliant.
- COVID-19 Secretariat has a very high compliance rate as well (4.87/5).

### Recommendation

#### ***Recommendation C.1:***

*Departments to keep in mind that, typically, the French version will take more space than the English. This should be planned ahead when the publications are designed. If there is no sufficient space for French fonts, both English and French fonts have to be reduced to make sure they are the same size.*



## Indicator D: French Communications intended for the public are easily accessible (French Communications and Services Standards, preamble, p. 5 )

### Key Observations

To verify this indicator, the keyword feature was tested in the Resources section of web pages. The Resources section contains forms, brochures, and other written instruments. A keyword in English was entered in search engine and then its equivalent in French, and a comparison was made to determine if the same documents were showing.

To determine the list of keywords that would be employed to test the keyword search feature, we enumerated the words that would most likely be used by members of the public when looking for information on programs and services on a specific website. Then, we applied the French equivalent most likely to be used by the average user.

### Keywords by Department

COVID-19 Secretariat	Department of Health and Social Services	Northwest Territories Health and Social Services Authority
Mask / Masque Vaccine/ Vaccin <a href="#">Self-Isolation</a> / Auto-isolement <a href="#">Travel</a> / Voyage <a href="#">Screening tool</a> / Outil de dépistage <a href="#">Moderna</a> / Moderna <a href="#">Cleaning</a> / Nettoyage <a href="#">Workers</a> / Travailleurs <a href="#">Caregivers</a> / Soignants	<a href="#">Suicide</a> / Suicide <a href="#">Help line</a> / Ligne d'aide <a href="#">Physician-Assisted Dying</a> / Aide-médicale à mourir <a href="#">Organ Donation</a> / Don d'organes <a href="#">Cannabis</a> / Cannabis <a href="#">Naloxone</a> / <a href="#">Naloxone</a> <a href="#">Complaint</a> / Plainte <a href="#">Hospital</a> / Hôpital Health care card / Carte d'assurance maladie <a href="#">Gonorrhea</a> / Gonorrhée <a href="#">Death</a> / Mort <a href="#">Birth</a> / Naissance <a href="#">Breastfeeding</a> / Allaitement	Abortion/Avortement Birth / Naissance Cancer / Cancer Mammography / Mammographie Mammographie Mental Health / Santé mentale Clinic / Clinique Vaccine/ Vaccin Chemotherapy / Chimiothérapie Baby / bébé Mask / Masque Appointment / Rendez-vous

The COVID-19 Secretariat got an average of 3.66/5. in comparison, NTHSSA got an average of 4.0 and the Department of Health and Social Services obtained 4.38.



## Positive Observations

- For the most part, the web pages are comparable in quality and content to English versions. It is very easy to navigate from the English page to the French page by clicking the “English” or “Français” tab on the top right of the screen.
- When checking the keyword feature in the resources section, most of the information was available with just a few clicks.

## Opportunities for Improvement

- The Resources section of the COVID-19 Secretariat website (in both the French and English version) is not easy to find. It is under the “Updates” section. When performing the audit, we initially thought there was no keyword search feature on the site until we finally came across the section by accident.
- In some instances, the lists of results are different in French and English. Most of the time, there are more publications suggested in English than French (although we came across situations where brochures or forms in French were more numerous than in English).
- It was noted that when some publications don’t show up, they are translated but not under the same format as the English version. Sometimes, the French version of an English factsheet is an actual web page. The information is completely translated and equivalent, but a member of the public looking for it in the Resources section of the website would probably not find it.
- In some cases, the only way to get access to the French publications is by using the English keywords on the French page. Departments can’t assume that users will know the English translation of the keyword used to access information on programs and services. Therefore, special attention should be taken to ensure the keyword search works properly with French keywords.
- The keywords recognized by the system are limited and prevent all the publications from being found.

## Recommendations

### ***Recommendation D.1:***

*We recommend that the French keyword search feature be able to recognize and use French keywords. The architecture of the system shouldn’t count on the fact that the member of the public looking for information will know the English translation of the program or services that they are looking for – much less assuming that this person will have the reflex to enter an English keyword in the French search engine.*

### ***Recommendation D.2:***

*We recommend that departments work with ISSS to explore the possibility of improving the keyword search feature by working on metadata to allow the system to recognize keywords*

*that are synonyms or in the same lexical field to increase the chance of capturing as many relevant publications as possible.*

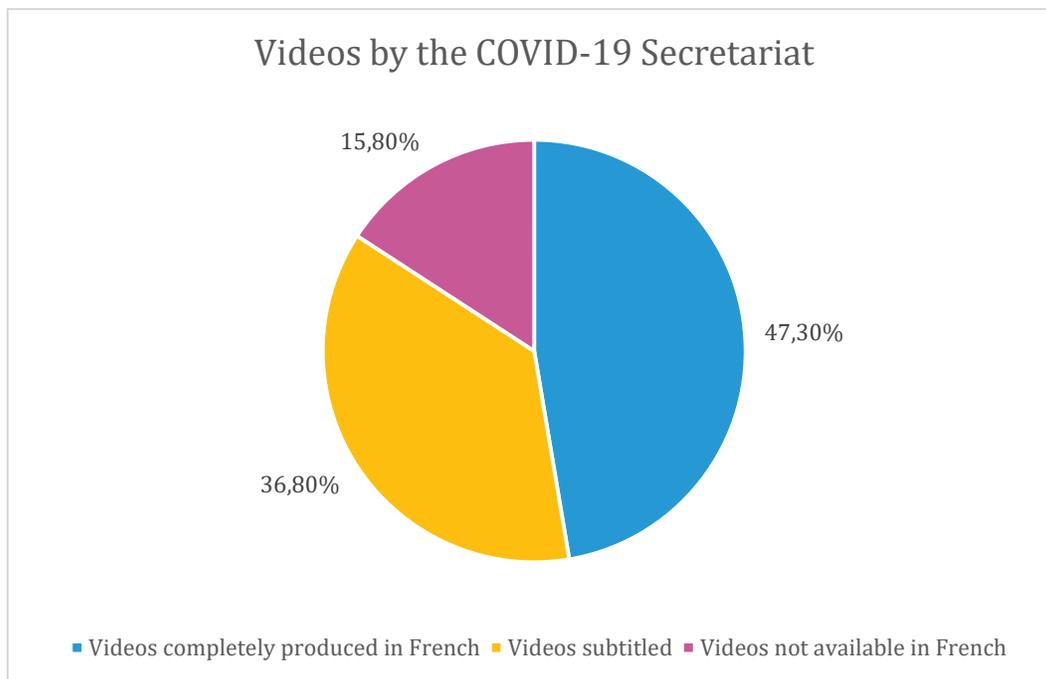
## Indicator E: All videos intended for the general public must be available in both French and English. (French Communications and Services Standards section 3.6.3)

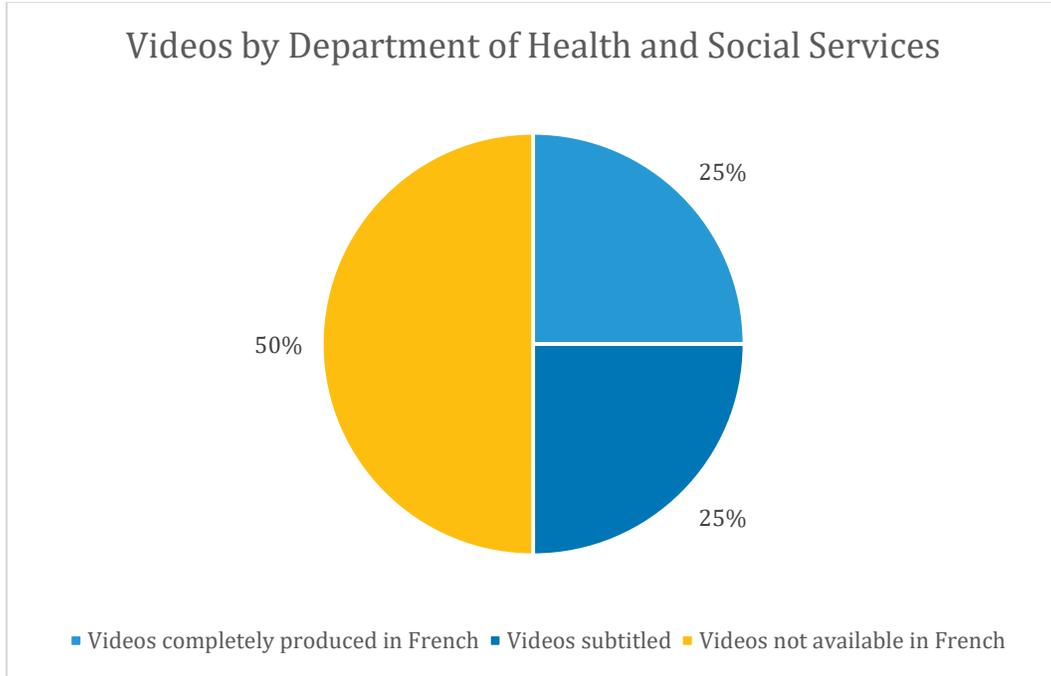
### Key Observations

The Standards state that videos must be available in French. Ideally, they would be entirely produced in French. Standards preferred dubbing than subtitle in videos. However, a video that meets one of those criteria (dubbing or subtitled), would meet basic standards.

The COVID-19 Secretariat achieved an average of 3.6/5 and the Department of Health and Social Services obtained 2.58/5.

The Northwest Territories Health and Social Services Authority and the Hay River Health and Social Services Authority did not post any videos on the pages covered by the audit. This criterion was not assessed for those institutions as a result.





### Positive Observations

- Some videos, like the one for the latest information on COVID-19 or the one for syphilis, obtained a perfect mark and are completely in French. The idea of using comic book-like images with external bilingual narration is a good practice because it makes the production of the video easier (no need to use two sets of bilingual actors) and will result in an identical video in French and English.
  - [youtu.be/yJWv40KX7wY](https://youtu.be/yJWv40KX7wY)
  - [youtu.be/e-7jpOYKNPE](https://youtu.be/e-7jpOYKNPE)

### Opportunity for Improvement

Video compliance rate could be improved, as the compliance rate of HSS is only 50%.

### Recommendation

***Recommendation E.1:***

*When posting third-party videos, it is ideal to post its equivalent French version, or make an effort to find a similar video in French.*

## Indicator F: Social media content is available in French and English (French Communications and Services Standards section 3.6.1)

### Key Observations

Government institutions are responsible for ensuring that social media content is available in English and French. They could choose to publish in both languages on the same page or opt for two separate pages, one in English, one in French, comparable to each other. The GNWT main Facebook page and the NTHSSA/ASTNO have two separate pages. HRHSSA opted to have one page that is bilingual. Both options are acceptable according to Standards 3.1.

In total, 129 posts were audited on the GNWT/GTNO Facebook page. The compliance rate was 4.34/5.

29 posts were audited on the NTHSSA/ASTNO Facebook page. They obtained a compliance rate of 3.38/5.

35 posts on the Facebook page for HRHSSA were audited. The compliance rate of 1.9/5 was obtained.

### Positive Observations

- The GNWT/GTNO has separate Facebook accounts for French and English. On those accounts, there is a link to the other account to let the user know that the page in the other language exists. The Standards state this as a good practice.

### Opportunities for Improvement

- It was noted that more than half of the social media posts by HRHSSA are not translated to French.
- There should be a disclaimer on the Facebook accounts of NTHSSA/ASTNO that the account is also available in English or French.
- While NTHSSA has an acceptable compliance for this indicator, special attention should be paid to ensure compliance improves, as several posts of potential public interest are not translated to French.
- Most of the pages that direct users to external English pages do not have a disclaimer saying that the page is available in English only (but as stated in the standards, ideally, departments should make a special effort to find French equivalent when possible).
- Some pictures published in the French posts have a description in English only.



## Recommendation

### ***Recommendation F.1:***

*We recommend that government institutions (especially HRHSSA) implement a translation process for social media postings to ensure that the Standards are met in that regard. Social media posts can be planned most of the time. Posts could be sent to translation service a few weeks in advance to ensure they are available in French on time. Also, translation process should be part of the communication process, so the French Standards are taken into account from the start.*



## Indicator G: Social media content is posted simultaneously in French and English (French Communications and Services Standards section 3.6.1)

### Key Observations

Because the purpose of this indicator was to measure the simultaneousness of Facebook posting only, the posts that were not translated were not evaluated under the criterion of simultaneousness.

To understand the context of the results presented, it is important to mention that on the Facebook pages of GNWT/GTNO, 129 posts were posted during the period audited, and 119 posts were translated and therefore audited under indicator G. In the case of NTHSSA, 29 social media posts were published, and 19 were translated and audited under indicator G. However, for HRHSSA, 35 Facebook posts were published during the period targeted by the audit but only 10 posts were translated and audited according to indicator G.

Since Standards don't provide a definition of "simultaneous", for the purpose of this audit, government institutions received a perfect mark if a French post was published at the same time or within minutes of its English equivalent; very good if the French post was posted the same hour and a pass mark when the French post was published the same day.

### Positive Observations

- The three Facebook pages audited almost reached a perfect mark for this indicator.

Page	Mark
<b>GNWT/GTNO</b>	4.73/5
<b>NTHSSA/ASTNO</b>	4.47/5
<b>HRHSSA</b>	5/5

- It is obvious that Departments made the necessary efforts to display information simultaneously on social media posts. When the pages are translated to French, they are usually posted at the same time or within the same hour.

### Opportunity for Improvement

- Although the compliance rate is high, there are still instances where the posts are not published at the same time.
- Less than a third of HRHSSA social media posts were eligible to be assessed under these criterion because most of them were not translated in the first place.

## Recommendation

***Recommendation G.1:***

*Institutions should ensure to have all the materials ready (in English and French) when they post them on Facebook to avoid unreasonable time gaps between English and French postings.*

## Indicator H: Any online comments in French must be answered in French. (French Communications and Services Standards section 3.6.1)

### Key Observations

At the time of the audit, no comment had been left in French on the Facebook pages of GNWT/GTNO, NTHSSA/ASTNO or HRHSSA. Therefore, it was impossible to assess this criterion for any of the government institutions.

The GNWT Facebook page has 9,300 subscribers (273 for its French equivalent, the GTNO page). NTHSSA has 1,698 subscribers (20 for the ASTNO Facebook page).

### Recommendations

#### ***Recommendation H.1:***

*The French Language Services Coordinating Committee and the Francophone Affairs Secretariat will collaborate with GNWT communicators to ensure a strategic and consistent approach on social media use to make sure posts reach the Francophone community and increase engagement.*

#### ***Recommendation H.2:***

*The Francophone Affairs Secretariat could adapt a few questions on social media usage and preferences in its annual French Community Satisfaction Survey.*



## Indicator I: Information from a 3rd party that is acting on behalf of the GNWT should be available in French (best practice)

### Key Observations

Links to third parties' websites and resources acting on behalf of the GNWT were rare on the websites. We came across this situation once during this audit, and it was on the Department of Health and Social Services website (Claiming an Extended Health Benefits Expense | Health and Social Services (gov.nt.ca) ). The health services claim form of the Alberta Blue Cross was available in English only.

The COVID-19 Secretariat and NTHSSA did not have links to third-party documents on their websites. This criterion was not assessed in their case.

### Opportunity for Improvement

The application form from a third party was available in English only.

### Recommendation

#### ***Recommendation I.1:***

*It is recommended that when government institutions empower a third party to act on their behalf, the request for proposals should advise proponents that their bid will require capacity in French in order to meet the evaluation criteria of the proposed contract. Similarly, the contract or contribution agreement formalizing the relationship should refer to the language obligations.*



## Conclusion

The services audit was deferred to a later date to prevent any potential negative impacts on limited resources and time of the implicated institutions due to COVID-19. The audit was also deferred so that the Secretariat would be in a better position to conduct it. This was the first audit conducted internally by the Secretariat; therefore, the GNWT's Internal Audit Bureau's help was sought.

As for the results of the audit, the GNWT and NWT health institutions included in this audit have generally been successful in providing quality information to the public in French. The translation of the websites has been completed, and most of the publications intended for the public were translated and accessible. Our observations regarding social media were overall positive, and the posts were available in both languages most of the time, allowing French-speaking residents to have access to quality information in real-time.

In the upcoming months or years, a challenge that GNWT departments will face is ensuring that details identified in the audit are refined, and the small gaps and issues identified in the audit are addressed to reach a better equivalence between communications in English and French.

It is in the GNWT's interest to continue implementing and strengthening business processes that will promote the official languages in compliance with the standards and the legislation.



## Appendix A - Detailed Scope

Perform a review of the following web pages and Facebook accounts to make sure the content of the French version is equivalent to the English one, as per the GNWT Standards for French Communications and Services (version 3.0).

When a web page links to another page or has a document attached, this content will be audited as well.

### Websites

#### Department of Health and Social Services ([www.hss.gov.nt.ca](http://www.hss.gov.nt.ca))

1. **Home** [www.hss.gov.nt.ca](http://www.hss.gov.nt.ca)
  - Interface only – global review of the main page
  
2. **Topics** [www.hss.gov.nt.ca/en/topics](http://www.hss.gov.nt.ca/en/topics)
  - 69/138 topics to be audited (that is 50%)
  - Pre-selected categories to be audited are in line with priorities identified in the French Community Satisfaction Survey 2019-2020 (Health and Wellness) or are general basic information required for new residents of the NWT:
    - Applying for Health [www.hss.gov.nt.ca/en/services/applying-health-care](http://www.hss.gov.nt.ca/en/services/applying-health-care)
    - Family Violence [www.hss.gov.nt.ca/en/services/family-violence](http://www.hss.gov.nt.ca/en/services/family-violence)
    - Immunization/Vaccination [www.hss.gov.nt.ca/en/services/immunization-vaccination](http://www.hss.gov.nt.ca/en/services/immunization-vaccination)
    - Mental Wellness and Addictions Recovery [www.hss.gov.nt.ca/en/services/mental-wellness-and-addictions-recovery-action-plan](http://www.hss.gov.nt.ca/en/services/mental-wellness-and-addictions-recovery-action-plan)
    - NWT Community Counselling Program [www.hss.gov.nt.ca/en/services/nwt-community-counselling-program-ccp](http://www.hss.gov.nt.ca/en/services/nwt-community-counselling-program-ccp)
    - NWT Health Care Plan [www.hss.gov.nt.ca/en/services/nwt-health-care-plan](http://www.hss.gov.nt.ca/en/services/nwt-health-care-plan)
    - NWT Help Line [www.hss.gov.nt.ca/en/services/nwt-help-line](http://www.hss.gov.nt.ca/en/services/nwt-help-line)
    - Renewing Your Health Care Card [www.hss.gov.nt.ca/en/services/renewing-your-health-care-card](http://www.hss.gov.nt.ca/en/services/renewing-your-health-care-card)
    - Suicide Prevention [www.hss.gov.nt.ca/en/services/suicide-prevention](http://www.hss.gov.nt.ca/en/services/suicide-prevention)
    - Syphilis [www.hss.gov.nt.ca/en/services/syphilis](http://www.hss.gov.nt.ca/en/services/syphilis)
  - The other 59 topics will be randomly selected to ensure the sample is representative. Every page will be assigned a number. Then, a random number generator will be used to determine which remaining topics will be audited.
  
3. **Resources** [www.hss.gov.nt.ca/en/resources](http://www.hss.gov.nt.ca/en/resources)
  - Select 'Filter by resource category'
  - Audit everything from 2018 to now, for the following categories:
    - Environmental Health

- Diseases and Conditions
- Addictions
- Health Coverage
- Mental Health
- Tobacco
- Child and Family Services
- Annual Reports
- Health Promotion
- Vital Statistics
- Seniors
- Persons with Disabilities
- Nutrition
- Early Childhood
- Caregivers
- Family Violence

#### 4. Test the Keyword Search feature

- The following keywords were entered in the keyword search (French keywords in the French page and the English ones on the English page). Check if the information found is the same in English and French.
  - Suicide / Suicide
  - Help Line / Ligne d'aide
  - Physician-Assisted Dying / Aide médicale à mourir
  - Organ Donation / Don d'organes
  - Cannabis / Cannabis
  - Naloxone / Naloxone
  - Complaint / Plainte
  - Hospital / Hôpital
  - Health Insurance Card / Carte assurance maladie
  - Gonorrhea / Gonorrhée
  - Death / Décès
  - Birth / Naissance
  - Breastfeeding / Allaitement

#### 5. About Us [www.hss.gov.nt.ca/en/about-us](http://www.hss.gov.nt.ca/en/about-us)

- Public Engagement
- Corporate Reports
- Funding Programs
- Health Care Service Complaints
- Meet the Minister
- Privacy
- Patient/Client Relations
- Contact Us

## 6. Newsroom

- Could not be completed. Brings to a website external to Department of Health and Social Services.

## NTHSSA ([www.nthssa.ca](http://www.nthssa.ca))

### 1. Home [www.nthssa.ca](http://www.nthssa.ca)

- Interface - only global review of the main page

### 2. About Us [www.nthssa.ca/en/about-us](http://www.nthssa.ca/en/about-us)

- At large – but in the Governance – Additional Resources section, focus only on Communities of Significant Demand

### 3. Regional Portals [www.nthssa.ca/en/regional-portals](http://www.nthssa.ca/en/regional-portals)

- Focus only on communities of significant demand, that is:
  - Beaufort Delta Region
  - Fort Smith Region
  - Stanton Territorial Hospital
  - Yellowknife Region

### 4. Programs and Services [www.nthssa.ca/en/services](http://www.nthssa.ca/en/services)

- 15/31, randomly selected (almost 50%). Every page will be assigned a number. Then, a random number generator will be used to determine the sample group.
- Test the keyword search feature.
- Enter the following keywords in the keyword search (enter the French keywords in the French page and the English ones on the English page). Check if the information found is the same in English and French.
  - Abortion / Avortement
  - Birth / Naissance
  - Cancer/ Cancer
  - Mammography / Mammographie
  - Mental Health / Santé mentale
  - Vaccine / Vaccin
  - Clinic / Clinique

## 5. Newsroom

- Could not be completed. Brings to a website external to NTHSSA

### 6. Resources [www.nthssa.ca/en/resources](http://www.nthssa.ca/en/resources)

- Select 'Filter by category'
- Audit 3 months randomly since 2018, for the following categories:
  - Seniors
  - Leadership Council
  - Cancer

- Primary Care
- Public Health
- Rehabilitation

7. Test the Keyword Search feature

- Enter the following keywords in the keyword search (enter the French keywords in the French page and the English ones on the English page). Check if the information found is the same in English and French.
  - Abortion/Avortement
  - Birth / Naissance
  - Cancer / Cancer
  - Mammography / Mammographie
  - Mental Health / Santé mentale
  - Clinic / Clinique
  - Vaccine/ Vaccin
  - Chemotherapy / Chimiothérapie
  - Baby / bébé
  - Mask / Masque
  - Appointment / Rendez-vous

**COVID-19 ([www.gov.nt.ca/covid-19](http://www.gov.nt.ca/covid-19))**

1. **COVID-19** [www.gov.nt.ca/covid-19](http://www.gov.nt.ca/covid-19)
  - Interface only - global review of the main page
2. **Travel + Self-Isolation** [www.gov.nt.ca/covid-19/en/services/travel-self-isolation](http://www.gov.nt.ca/covid-19/en/services/travel-self-isolation)
  - At large
3. **Health + Well Being** [www.gov.nt.ca/covid-19/en/services/health-and-well-being](http://www.gov.nt.ca/covid-19/en/services/health-and-well-being)
  - At large
4. **Reopening** [www.gov.nt.ca/covid-19/en/services/public-health-orders/emerging-wisely](http://www.gov.nt.ca/covid-19/en/services/public-health-orders/emerging-wisely)
  - At large
5. **Business + Work**
  - No – mostly related to other departments, i.e. ECE, WSCC, ITI
6. **Everyday Life** [www.gov.nt.ca/covid-19/en/everyday-life](http://www.gov.nt.ca/covid-19/en/everyday-life)
  - At large
7. **Updates** [www.gov.nt.ca/covid-19/en/updates-0](http://www.gov.nt.ca/covid-19/en/updates-0)
  - At large, except the Resources section where publications of 3 months chosen randomly were selected.



## 8. Test the Keyword Search feature

- Enter the following keywords in the keyword search (enter the French keywords in the French page and the English ones on the English page). Check if the information found is the same in English and French.
  - Mask / Masque
  - Vaccine / Vaccin
  - Self-Isolation / Isolement
  - Travel/ Voyage
  - Screening tool /Outil de dépistage
  - Moderna/ Moderna
  - Cleaning / Lavage
  - Workers / Travailleurs
  - Caregivers / Soignants

## Facebook Pages

### Corporate Communications ([www.facebook.com/yourGNWT](http://www.facebook.com/yourGNWT), [www.facebook.com/votreGTNO](http://www.facebook.com/votreGTNO))

- Select randomly 2 months in the past 10 months (from March 2020 and December 31, 2020) and audit all the news releases published during those months (May and September 2020 were selected).
- Within those 2 months, check if posts were published simultaneously in French and English.
- Within those 2 months, check if comments posted in French were answered in French (if applicable).

### NTHSSA ([www.facebook.com/NTHSSA](http://www.facebook.com/NTHSSA), [www.facebook.com/ASTNO2](http://www.facebook.com/ASTNO2))

- Select randomly 2 months in the past 10 months (from March 2020 and December 31, 2020) and audit all the news releases published during those months. (March and December 2020 were selected).
- Within those 2 months, check if posts were published simultaneously in French and English.
- Within those 2 months, check if comments posted in French were answered in French (if applicable).

### HRHSSA ([www.facebook.com/Hay-River-Regional-Health-Centre-1454565548205248](http://www.facebook.com/Hay-River-Regional-Health-Centre-1454565548205248))

- Select randomly 2 months in the past 10 months (from March 2020 and December 31, 2020) and audit all the news releases published during those months. (July and October 2020 were selected).
- Within those 2 months, check if posts were published simultaneously in French and English.
- Within those 2 months, check if comments posted in French were answered in French (if applicable).



## Appendix B - Indicators Scale

Criteria					Rating/Importance
<b>a. Content of the website is translated and comparable in quality and content in both French and English (Standards p. 25)</b>					<b>20</b>
<b>1 Fail</b>	<b>2 Needs Improvement</b>	<b>3 Satisfactory</b>	<b>4 Very Good</b>	<b>5 Excellent</b>	
Not translated at all or Page translated but not the most recent version	It's evident that the content is not the same	Page translated but several missing elements	1 or 2 missing elements	Completely translated, pages matched exactly	
<b>b. Written instruments (forms, brochures, etc.) intended for the public should be represented in both English and French websites (Standards p. 31)</b>					<b>20</b>
<b>NO</b>		<b>YES</b>			
The written instrument is not represented in French on the website		The written instrument is represented in French on the website			
<b>c. French and English fonts are of equal prominence (Standards p. 31)</b>					<b>5</b>
<b>NO</b>		<b>YES</b>			

French and English fonts are not the same size		Font in both languages are the same size			
<b>d. French communications intended for the public are easily accessible (Standards p. 5 and 25)</b>					<b>15</b>
<b>1 Fail</b>	<b>2 Needs Improvement</b>	<b>3 Satisfactory</b>	<b>4 Very Good</b>	<b>5 Excellent</b>	
Document is not accessible in French	Document exists but not easily searchable or Document exists but when doing a research by keywords nothing comes up	Document is accessible in French but the title is in English on the website	When doing a search by keywords, the information shows up but is not equivalent Or When user clicks on "Français" it brings them to main page of Resources section	When doing a search by keywords, the information shows up and is equivalent Or When user is on the English page, if they click on "Français" they access the French document automatically	
<b>e. All videos intended for the general public must be available in both French and English (Standards p. 26)</b>					<b>12</b>
<b>1 Fail</b>	<b>2 Needs Improvement</b>	<b>3 Satisfactory</b>	<b>4 Very Good</b>	<b>5 Excellent</b>	
Video is not available in French	Video is produced in French	Video is subtitled or	Video is done in French, graphics	Video is fully in French, graphics	

	(subtitled or dubbed) but subtitles are hard to read or voices are difficult to understand	Video is dubbed	are similar with some English elements in the graphics	are identical and fully translated, voices are perfectly understandable	
<b>f. Social media content is available in French and English (Standards p. 23)</b>					<b>20</b>
<b>1 Fail</b>	<b>2 Needs Improvement</b>	<b>3 Satisfactory</b>	<b>4 Very Good</b>	<b>5 Excellent</b>	
Post is not translated	Post is not equivalent	Post is almost equivalent, some information is missing (sentence, link, etc.)	Posts are equivalent but links lead to English websites	Posts are equivalent and links direct to French or equivalent websites	
<b>g. Social media content is posted simultaneously in French and English (Standards p. 25)</b>					<b>5</b>
<b>1 Fail</b>	<b>2 Needs Improvement</b>	<b>3 Satisfactory</b>	<b>4 Very Good</b>	<b>5 Excellent</b>	
Not posted in French	French posted the next day or later	French posted the same day	French posted the same hour	French posted at the same time or within minutes	
<b>h. Any online comments in French must be answered in French (Standards p. 23)</b>					<b>Not rated**</b>

<b>1 Fail</b>	<b>2 Needs Improvement</b>	<b>3 Satisfactory</b>	<b>4 Very Good</b>	<b>5 Excellent</b>	
Comments in French are not answered	Comments in French are answered in English	Comments are answered in French but not in a timely manner and quality of French is poor	Comments answered in French but not in a timely manner, but quality of French is good	Comments answered in French, in a timely manner, quality of French is good	
<b>i. Information from a 3rd party that is acting on behalf of the GNWT should be available in French (Best practice)</b>					<b>3</b>
<b>NO</b>		<b>YES</b>			
Information leading to a 3rd party that is acting on behalf of the GNWT is not available in French		Information leading to a 3rd party that is acting on behalf of the GNWT is available in French			
<b>j. When creating generic email addresses, special thought should be put toward making it as close to bilingual as possible (Standards p. 18) (this is an ASSET, not a formal requirement)</b>					<b>Not rated</b>
Not rated, this is an asset only. Will be noted only if we come across those situations.					
<b>TOTAL</b>					<b>100</b>

# Appendix C - Risk Assessment - COVID-19 Secretariat

Francophone Affairs Secretariat											
Risk Assessment											
Risk Owner: Northwest Territories Health and Social Services Authority											
Objective: French Websites and social media are accessible and available to the French speaking community.											
Date: March 9, 2021											
#	Risk/Event	Trigger/Cause	Consequence/Impact	Inherent Risk			Control Objectives	Mitigating Controls	Residual Risk		
				L	I	Risk Rating			L	I	Risk Rating
1	The contents of the websites, written instruments and social media posts intended for public use are not translated to French	<p>Department did not ask for translation.</p> <p>Poor processes related to translation within the Department.</p> <p>Poor translation.</p> <p>Lack of knowledge of the Standards.</p>	<p>Lack of transparency of public health information.</p> <p>Poor public service - French speaking individuals don't receive appropriate and timely services.</p> <p>Losing public trust by not providing adequate information.</p> <p>Negative media coverage.</p>	5	3	High (8)	<p>Management interest /eager participation.</p> <p>Management and employees awareness of the French communications standards.</p> <p>Available resources (qualified staff).</p> <p>Defined translation process for Web pages and social media postings.</p> <p>Implement in-house continuous monitoring to make sure communications are compliant.</p> <p>Leveraging the expertise and technology of the Translation service of the Francophone Affairs Secretariat.</p>	<p><b>GNWT</b></p> <p>Official Languages Act and Regulations.</p> <p>GNWT Standards for French communications and Services.</p> <p>GNWT Strategic Plan on French Communications and Services.</p> <p>GNWT Visual Identity Program Guidelines.</p> <p>GNWT Consistent User Experience (CUE) Guidelines.</p> <p>GNWT Web and Digital Presence Committee (WDPC).</p> <p>Reminders and Monitoring done by French Language Services Coordonnators.</p> <p>Language Coordinators meeting with SMC.</p> <p>Updates of Operating Plans.</p> <p><b>Government of Canada</b></p> <p>NWT-Canada French Language Services Agreement.</p> <p><b>Francophone Affairs Secretariat</b></p> <p>Compliance audits by Francophone Affairs Secretariat.</p>	3	2	Medium (5)
2	The French translations of the Websites or written instruments are not comparable in quality and prominence to their English counterparts.	<p>Poor quality of translation due to use of external translators, bilingual GNWT staff who are not translators or translation software instead of GNWT translators.</p> <p>Design challenges created by the fact that insufficient space was planned for the French text.</p> <p>Lack of knowledge of the Standards.</p> <p>Lack of design proficiency.</p>	<p>Embarrassment for Ministers.</p> <p>Legal challenge.</p> <p>Damage to GNWT reputation.</p> <p>Investigation by Language Commissioner.</p> <p>Loss of credibility with Canadian Heritage.</p>	4	3	Medium (7)	<p>Implement in-house continuous monitoring to make sure communications are compliant.</p>	<p>Reminders and Monitoring done by French Language Services Coordonnators.</p> <p>Language Coordinators meeting with SMC.</p> <p>Updates of Operating Plans.</p> <p><b>Government of Canada</b></p> <p>NWT-Canada French Language Services Agreement.</p> <p><b>Francophone Affairs Secretariat</b></p> <p>Compliance audits by Francophone Affairs Secretariat.</p> <p>Reminders and advice to the Departments by the Francophone Affairs Secretariat.</p> <p>Monitoring of Operating Plans by the Monitoring and Evaluation Advisor.</p> <p>Monitoring and Evaluation Advisor position is filled.</p> <p>Partnership with community.</p>	3	2	Medium (5)
3	Access to equivalent French web pages is difficult.	<p>Failure to comply with Consistent User Experience (CUE).</p> <p>Where CUE exempt, design doesn't accommodate bilingual format.</p>		5	3	High (8)		<p>Reminders and advice to the Departments by the Francophone Affairs Secretariat.</p> <p>Monitoring of Operating Plans by the Monitoring and Evaluation Advisor.</p> <p>Monitoring and Evaluation Advisor position is filled.</p> <p>Partnership with community.</p>	3	2	Medium (5)
4	3rd Party information provided on behalf of GNWT is not translated in French.	<p>Departments are not aware of this obligation.</p> <p>French requirement is not included in the agreement with third party.</p>		N/A	N/A	N/A			N/A	N/A	N/A
5	There is lower compliance to language standards due to the uniqueness of the pandemic situation (emergency situation).	<p>Pressure to have the information made public as soon as possible due to the emergency.</p> <p>Perception that legal emergency requirements prevail over legal lingusitic obligations.</p>		4	3	Medium (7)			3	2	Medium (5)

# Appendix D - Risk Assessment - NTHSSA

Francophone Affairs Secretariat											
Risk Assessment											
Risk Owner: Northwest Territories Health and Social Services Authority											
French Websites and social media are accessible and available to the French speaking community.											
Objective											
Date: March 9, 2021											
#	Risk/Event	Trigger/Cause	Consequence/Impact	Inherent Risk			Control Objectives	Mitigating Controls	Residual Risk		
				L	I	Risk Rating			L	I	Risk Rating
1	The contents of the websites, written instruments and social media posts intended for public use are not translated to French	<p>Department did not ask for translation.</p> <p>Poor processes related to translation within the Department.</p> <p>Poor translation.</p> <p>Lack of knowledge of the Standards.</p>	<p>Lack of transparency of public health information.</p> <p>Poor public service - French speaking individuals don't receive appropriate and timely services.</p> <p>Losing public trust by not providing adequate information.</p> <p>Negative media coverage.</p>	5	3	High (8)	<p>Management interest /eager participation.</p> <p>Management and employees awareness of the French communications standards.</p> <p>Available resources (qualified staff).</p> <p>Defined translation process for Web pages and social media postings.</p> <p>Implement in-house continuous monitoring to make sure communications are compliant.</p> <p>Leveraging the expertise and technology of the Translation service of the Francophone Affairs Secretariat.</p>	<p><b>GNWT</b></p> <p>Official Languages Act and Regulations.</p> <p>GNWT Standards for French communications and Services.</p> <p>GNWT Strategic Plan on French Communications and Services.</p> <p>GNWT Visual Identity Program Guidelines.</p> <p>GNWT Consistent User Experience (CUE) Guidelines.</p> <p>GNWT Web and Digital Presence Committee (WDPC).</p> <p>Reminders and Monitoring done by French Language Services Coordonnators.</p> <p>Language Coordinators meeting with SMC.</p> <p>Updates of Operating Plans.</p> <p><b>Government of Canada</b></p> <p>NWT-Canada French Language Services Agreement.</p> <p><b>Francophone Affairs Secretariat</b></p> <p>Compliance audits by Francophone Affairs Secretariat.</p>	3	2	Medium (5)
2	The French translations of the Websites or written instruments are not comparable in quality and prominence to their English counterparts.	<p>Poor quality of translation due to use of external translators, bilingual GNWT staff who are not translators or translation software instead of GNWT translators.</p> <p>Design challenges created by the fact that insufficient space was planned for the French text.</p> <p>Lack of knowledge of the Standards.</p> <p>Lack of design proficiency.</p>	<p>Embarrassment for Ministers.</p> <p>Legal challenge.</p> <p>Damage to GNWT reputation.</p> <p>Investigation by Language Commissioner.</p> <p>Loss of credibility with Canadian Heritage.</p>	4	3	Medium (7)	<p>Implement in-house continuous monitoring to make sure communications are compliant.</p>	<p>Reminders and Monitoring done by French Language Services Coordonnators.</p> <p>Language Coordinators meeting with SMC.</p> <p>Updates of Operating Plans.</p> <p><b>Government of Canada</b></p> <p>NWT-Canada French Language Services Agreement.</p> <p><b>Francophone Affairs Secretariat</b></p> <p>Compliance audits by Francophone Affairs Secretariat.</p> <p>Reminders and advice to the Departments by the Francophone Affairs Secretariat.</p> <p>Monitoring of Operating Plans by the Monitoring and Evaluation Advisor.</p> <p>Monitoring and Evaluation Advisor position is filled.</p> <p>Partnership with community.</p>	3	2	Medium (5)
3	Access to equivalent French web pages is difficult.	<p>Failure to comply with Consistent User Experience (CUE).</p> <p>Where CUE exempt, design doesn't accommodate bilingual format.</p>		5	3	High (8)		<p>Reminders and advice to the Departments by the Francophone Affairs Secretariat.</p> <p>Monitoring of Operating Plans by the Monitoring and Evaluation Advisor.</p> <p>Monitoring and Evaluation Advisor position is filled.</p> <p>Partnership with community.</p>	3	2	Medium (5)
4	3rd Party information provided on behalf of GNWT is not translated in French.	<p>Departments are not aware of this obligation.</p> <p>French requirement is not included in the agreement with third party.</p>		N/A	N/A	N/A			N/A	N/A	N/A
5	There is lower compliance to language standards due to the uniqueness of the pandemic situation (emergency situation).	<p>Pressure to have the information made public as soon as possible due to the emergency.</p> <p>Perception that legal emergency requirements prevail over legal lingusitic obligations.</p>		4	3	Medium (7)			3	2	Medium (5)

# Appendix E - Risk Assessment - Department of Health and Social Services

Francophone Affairs Secretariat Risk Assessment											
Risk Owner: Department of Health and Social Services											
Objective: French Websites are accessible and available to the French speaking community.											
Date: March 9, 2021											
#	Risk/Event	Trigger/Cause	Consequence/Impact	Inherent Risk			Control Objectives	Mitigating Controls	Residual Risk		
				L	I	Risk Rating			L	I	Risk Rating
1	The contents of the websites, written instruments and videos intended for public use are not translated to French	Department did not ask for translation.  Poor processes related to translation within the Department.  Poor translation.  Lack of knowledge of the Standards.	Lack of transparency of public health information.  Poor public service - French speaking individuals don't receive appropriate and timely services.  Losing public trust by not providing adequate information.  Negative media coverage.	5	3	High (8)	Management Interest /eager participation.  Management and employees awareness of the French communications standards.  Available resources (qualified staff).	GNWT Official Languages Act and Regulations.  GNWT Standards for French communications and Services.  GNWT Strategic Plan on French Communications and Services.  GNWT Visual Identity Program Guidelines.  GNWT Consistent User Experience (CUE) Guidelines.	3	2	Medium (5)
2	The French translations of the Websites or written instruments are not comparable in quality and prominence to their English counterparts.	Poor quality of translation due to use of external translators, bilingual GNWT staff who are not translators or translation software instead of GNWT translators.  Design challenges created by the fact that insufficient space was planned for the French text.  Lack of knowledge of the Standards.  Lack of design proficiency.	Embarrassment for Ministers.  Legal challenge.  Damage to GNWT reputation.  Investigation by Language Commissioner.  Loss of credibility with Canadian Heritage.	4	3	Medium (7)	Defined translation process for Web pages and social media postings.  Implement in-house continuous monitoring to make sure communications are compliant.  Leveraging the expertise and technology of the Translation service of the Francophone Affairs Secretariat.	GNWT Web and Digital Presence Committee (WDPC).  Reminders and Monitoring done by French Language Services Coordinators.  Language Coordinators meeting with SMC.  Updates of Operating Plans.  Government of Canada NWT-Canada French Language Services Agreement.  Francophone Affairs Secretariat Compliance audits by Francophone Affairs Secretariat.	3	2	Medium (5)
3	Access to equivalent French web pages is difficult.	Failure to comply with Consistent User Experience (CUE).  Where CUE exempt, design doesn't accommodate bilingual format.		5	3	High (8)			3	2	Medium (5)
4	3rd Party Information provided on behalf of GNWT is not translated in French.	Departments are not aware of this obligation.  French requirement is not included in the agreement with third party.		4	2	Medium (6)		Reminders and advice to the Departments by the Francophone Affairs Secretariat.  Monitoring of Operating Plans by the Monitoring and Evaluation Advisor.	3	1	Low (4)
5	There is lower compliance to language standards due to the uniqueness of the pandemic situation (emergency situation).	Pressure to have the information made public as soon as possible due to the emergency.  Perception that legal emergency requirements prevail over legal linguistic obligations.		4	3	Medium (7)		Monitoring and Evaluation Advisor position is filled.  Partnership with community.	3	2	Medium (5)

# Appendix F - Risk Assessment - Facebook Account Gouvernement of the Northwest Territories / Gouvernement Des Territoires Du Nord-Ouest

Francophone Affairs Secretariat											
Risk Assessment											
Risk Owner: GNWT/GTNO Facebook Pages (Corporate Communications)											
Social media are accessible and available to the French speaking community.											
Objective											
Date: March 9, 2021											
#	Risk/Event	Trigger/Cause	Consequence/Impact	Inherent Risk			Control Objectives	Mitigating Controls	Residual Risk		
				L	I	Risk Rating			L	I	Risk Rating
1	The contents of videos and social media posts intended for public use are not translated to French	Department did not ask for translation.  Poor processes related to translation within the Department.  Poor translation.  Lack of knowledge of the Standards.	Lack of transparency of public health information.  Poor public service - French speaking individuals don't receive appropriate and timely services.  Losing public trust by not providing adequate information.  Negative media coverage.	5	3	High (8)	Management interest /eager participation.  Management and employees awareness of the French communications standards.  Available resources (qualified staff).	Official Languages Act and Regulations.  GNWT Standards for French communications and Services.  GNWT Strategic Plan on French Communications and Services.  GNWT Visual Identity Program Guidelines.	3	2	Medium (5)
2	The French translations of social media are not comparable in quality and prominence to their English counterparts.	Poor quality of translation due to use of external translators, bilingual GNWT staff who are not translators or translation software instead of GNWT translators.  Design challenges created by the fact that insufficient space was planned for the French text.  Lack of knowledge of the Standards.  Lack of design proficiency.	Embarrassment for Ministers.  Legal challenge.  Damage to GNWT reputation.  Investigation by Language Commissioner.  Loss of credibility with Canadian Heritage.	4	3	Medium (7)	Defined translation process for Web pages and social media postings.  Implement in-house continuous monitoring to make sure communications are compliant.  Leveraging the expertise and technology of the Translation service of the Francophone Affairs Secretariat.	GNWT Consistent User Experience (CUE) Guidelines.  GNWT Web and Digital Presence Committee (WDPC).  Reminders and Monitoring done by French Language Services Coordinators.  Language Coordinators meeting with SMC.  Updates of Operating Plans.	3	2	Medium (5)
3	Access to equivalent French web pages is difficult.	Failure to comply with Consistent User Experience (CUE).  Where CUE exempt, design doesn't accommodate bilingual format.		N/A	N/A	N/A		NWT-Canada French Language Services Agreement.  Francophone Affairs Secretariat  Compliance audits by Francophone Affairs Secretariat.	N/A	N/A	N/A
4	3rd Party information provided on behalf of GNWT is not translated in French.	Departments are not aware of this obligation.  French requirement is not included in the agreement with third party.		N/A	N/A	N/A		Reminders and advice to the Departments by the Francophone Affairs Secretariat.  Monitoring of Operating Plans by the Monitoring and Evaluation Advisor.	N/A	N/A	N/A
5	There is lower compliance to language standards due to the uniqueness of the pandemic situation (emergency situation).	Pressure to have the information made public as soon as possible due to the emergency.  Perception that legal emergency requirements prevail over legal linguistic obligations.		4	3	Medium (7)		Monitoring and Evaluation Advisor position is filled.  Partnership with community.	3	2	Medium (5)

# Appendix G - Risk Assessment - Facebook Account HRHSSA

Francophone Affairs Secretariat											
Risk Assessment											
Risk Owner: May River Health and Social Services Authority											
Objective: Social media are accessible and available to the French speaking community.											
Date: March 9, 2021											
#	Risk/Event	Trigger/Cause	Consequence/Impact	Inherent Risk			Control	Residual Risk			
				L	I	Risk Rating		L	I	Risk Rating	
1	The contents of social media posts intended for public use are not translated to French	Department did not ask for translation.  Poor processes related to translation within the Department.  Poor translation.  Lack of knowledge of the Standards.	Lack of transparency of public health information.  Poor public service - French speaking individuals don't receive appropriate and timely services.  Losing public trust by not providing adequate information.  Negative media coverage.	5	3	High (8)	Management interest /eager participation.  Management and employees awareness of the French communications standards.  Available resources (qualified staff).	Official Languages Act and Regulations.  GNWT Standards for French communications and Services.  GNWT Strategic Plan on French Communications and Services.  GNWT Visual Identity Program Guidelines.	3	2	Medium (5)
2	The French translations of social media are not comparable in quality and prominence to their English counterparts.	Poor quality of translation due to use of external translators, bilingual GNWT staff who are not translators or translation software instead of GNWT translators.  Design challenges created by the fact that insufficient space was planned for the French text.  Lack of knowledge of the Standards.  Lack of design proficiency.	Embarrassment for Ministers.  Legal challenge.  Damage to GNWT reputation.  Investigation by Language Commissioner.  Loss of credibility with Canadian Heritage.	4	3	Medium (7)	Defined translation process for Web pages and social media postings.  Implement in-house continuous monitoring to make sure communications are compliant.  Leveraging the expertise and technology of the Translation service of the Francophone Affairs Secretariat.	GNWT Consistent User Experience (CUE) Guidelines.  GNWT Web and Digital Presence Committee (WDPC).  Reminders and Monitoring done by French Language Services Coordinators.  Language Coordinators meeting with SMC.  Updates of Operating Plans.	3	2	Medium (5)
3	Access to equivalent French web pages is difficult.	Failure to comply with Consistent User Experience (CUE).  Where CUE exempt, design doesn't accommodate bilingual format.		N/A	N/A	N/A		NWT-Canada French Language Services Agreement.  Francophone Affairs Secretariat  Compliance audits by Francophone Affairs Secretariat.	N/A	N/A	N/A
4	3rd Party information provided on behalf of GNWT is not translated in French.	Departments are not aware of this obligation.  French requirement is not included in the agreement with third party.		N/A	N/A	N/A		Reminders and advice to the Departments by the Francophone Affairs Secretariat.  Monitoring of Operating Plans by the Monitoring and Evaluation Advisor.	N/A	N/A	N/A
5	There is lower compliance to language standards due to the uniqueness of the pandemic situation (emergency situation).	Pressure to have the information made public as soon as possible due to the emergency.  Perception that legal emergency requirements prevail over legal linguistic obligations.		4	3	Medium (7)		Monitoring and Evaluation Advisor position is filled.  Partnership with community.	3	2	Medium (5)

## Appendix H - Summary of Recommendations

#	Recommendations
<b>A.1</b>	We recommend to the Departments that they work in collaboration with the Web Team of Information and Shared Systems Services to help them address the structural problem of the website. Departments can submit helpdesk tickets with the list of sections that will need to be looked at. Governments institutions also have to keep in mind that the Web team of ISSS can be a helpful resource in the case they need technical support to improve their websites.
<b>A.2</b>	We also recommend that the departments and agencies, (through their French language coordinators for instance), coordinate the regular review of their websites to monitor and maintain the quality of French translations.
<b>A.3</b>	We encourage departments to ensure analysis of public usage of websites.
<b>B.1</b>	To make the written instruments easier to search and more accessible to French speakers, we recommend that French titles be used to name the document on the website. A good practice would be that when the communications officer received the document from the vendor, they should open the document and save it under the name created by the translator.
<b>C.1</b>	Departments to keep in mind that, typically, the French version will take more space than the English. This should be planned ahead when the publications are designed. If there is no sufficient space for French fonts, both English and French fonts have to be reduced to make sure they are the same size.
<b>D.1</b>	We recommend that the French keyword search feature be able to recognize and use French keywords. The architecture of the system shouldn't count on the fact that the member of the public looking for information will know the English translation of the program or services that they are looking for – much less assuming that this person will have the reflex to enter an English keyword in the French search engine.
<b>D.2</b>	We recommend that Departments work with ISSS to explore the possibility of improving the keyword search feature by working on metadata to allow the system to recognize keywords that are synonyms or in the same lexical field to increase the chance of capturing as many relevant publications as possible.

<b>E.1</b>	When posting videos of a third-party, it is ideal to post its equivalent French version, or make an effort to find similar video in French.
<b>F.1</b>	We recommend that government institutions (especially HRHSSA) define a translation process for social media postings to ensure that the Standards are met in that regard. Social media posts can be planned most of the time. Posts could be sent to translation service a few weeks in advance to ensure they are available in French on time. Also, translation process should be part of the communications process so the French standards are taken into account from the start.
<b>G.1</b>	Institutions should ensure to have all the material ready (in English and French) when they publish on Facebook to avoid unreasonable gaps between English and French postings.
<b>H.1</b>	The French Language Services Coordinating Committee and the Francophone Affairs Secretariat will collaborate with GNWT communicators to ensure a strategic approach on social media use to make sure social media reach the Francophone Community and increase engagement.
<b>H.2</b>	The Francophone Affairs Secretariat could adapt a few questions on social media usage and preferences in its annual French Community Survey.
<b>I.1</b>	It is recommended that when government institutions empower a third party to act on their behalf, the request for proposals should advise proponents that their bid will require capacity in French in order to meet the evaluation criteria of the proposed contract. Similarly, the contract or contribution agreement formalizing the relationship should refer to the language obligations.

## Appendix I - Summary of Final Marks

Indicators	Government Institutions				
	NTHSSA	HSS	COVID-19 SECRETARIAT	HRHSSA	GNWT/GTNO (Corporate Communications)
<b>A</b>	16.28/20	17.56/20	16.65/20	N/A	N/A
<b>B</b>	16.6/20	18.32/20	18.2/20	N/A	N/A
<b>C</b>	5/5	5/5	4.87/5	N/A	N/A
<b>D</b>	12/15	13.14/15	10.98/15	N/A	N/A
<b>E</b>	N/A	6.2/12	7.54/12	N/A	N/A
<b>F</b>	13.52/20	N/A	N/A	7.08/20	17.36/20
<b>G</b>	4,47/5	N/A	N/A	5/5	4.73/5
<b>H</b>	N/A	N/A	N/A	N/A	N/A
<b>I</b>	N/A	0.6/3	N/A	N/A	N/A
<b>TOTAL</b>	67.87/85	60.82/75	58.24/72	12.08/25	22.09/25
<b>TOTAL COMPLIANCE RATE</b>	80%	81%	81%	48%	88%

## Appendix J - Audit Risk Assessment Heat Map<sup>6</sup>

(A) Likelihood	(B) Impact					(C) Overall Risk	
	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Extreme		
<b>5. Almost Certain</b>	6	7	8	9	10	Very High	≥ 9
<b>4. Likely</b>	5	6	7	8	9	High	8
<b>3. Possible</b>	4	5	6	7	8	Medium	5 to 7
<b>2. Unlikely</b>	3	4	5	6	7	Low	4
<b>Rare</b>	2	3	4	5	6	Very Low	≤ 3

### Likelihood of Risk

Likelihood of Risk	Criteria
<b>5 - Almost Certain</b>	Event has occurred in the last two years or the likelihood of it happening in the next 3 to 5 years is high (>75%)
<b>4 - Likely</b>	Event has occurred in the last five years or it could happen again in the next 3 to 5 years (50% to 75%)
<b>3 - Possible</b>	Has occurred in the last seven years or the likelihood of it happening in the next 3 to 5 years is moderate (25 to 50%)

<sup>6</sup> Internal Audit Bureau – September 2020

<b>2 - Unlikely</b>	Has occurred in the last ten years or the likelihood of it happening is moderate (not higher than 25%)
<b>1 - Rare</b>	Has not happened in more than ten years or is not likely to occur in the next 3 to 5 years (<10%)

## Overall Risk

The overall risk is calculated using the following formula:

- Likelihood + Impact (Damages & Liabilities \*30% + Operational Effect \* 20% + Reputation \*50%)
- Round up the value

For example, a likely event [4] + with a Major Damage & Liability impact [4\*.3] + an Insignificant Operational Effect [1\*.2] + and Moderate Reputation impact [3\*.5] will result in an overall score of 6.9. This would be rounded up to 7 for the Overall Risk of Medium.

Impact Level	Damages and Liability (30%)	Operational Effects (20%)	Reputation (50% Weight)
<b>5. Extreme: Requires regular engagement by Senior Management</b>	<ul style="list-style-type: none"> <li>• More than \$50 million in damages/loss, or increase/decrease in funding</li> <li>• Loss of life or key physical assets</li> <li>• Irreparable, significant damage to the environment</li> <li>• Major exposure of critical confidential information or privacy breach of information</li> </ul>	<ul style="list-style-type: none"> <li>• Unable to perform mandated services for an extended period</li> <li>• &gt;\$50 million in cost savings/overruns in delivery of services over three years or project life</li> <li>• &gt;\$50 million from a revenue source</li> <li>• NWT wide impact</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholders outrage, trust not recoverable without a major change in administration/Minister</li> <li>• A public inquiry or high-level public officials criminally charged</li> <li>• Very positive/negative public ratings</li> <li>• Very significant increase/decrease in quality of life indications with impact on GNWT/department image</li> </ul>
<b>4. Major: Requires</b>	<ul style="list-style-type: none"> <li>• Incur/damages of/by \$10 to</li> </ul>	<ul style="list-style-type: none"> <li>• Significant</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholders disgust, trust</li> </ul>

<p><b>detailed research and planning by Senior Management</b></p>	<p>\$50 million</p> <ul style="list-style-type: none"> <li>• Serious injuries to more than one public or staff member resulting in some disability</li> <li>• Loss of significant physical assets</li> <li>• Major environmental damage – extended clean-up required/some permanent damage</li> <li>• Significant exposure of confidential and private information</li> </ul>	<p>improvements/disruption in the delivery of mandated services</p> <ul style="list-style-type: none"> <li>• Significant gain/loss of service knowledge or data</li> <li>• Significant over/underachievement of service/ service group objectives</li> <li>• Cost savings/overruns in delivery of services of \$10 to \$50 million over three years or project life</li> <li>• Additional revenue of \$10 to \$50 million</li> <li>• Multiregional impact</li> </ul>	<p>severely damaged</p> <ul style="list-style-type: none"> <li>• Public/media outcry for removal of public officials</li> <li>• Strong praise/criticism by review agencies</li> <li>• Strong praise/criticism by independent audit</li> <li>• Public trial</li> <li>• Significant increase/decrease in quality of life indicators with resulting impact on GNWT/department image</li> </ul>
<p><b>3. Moderate: Requires specific allocation of management responsibility</b></p>	<ul style="list-style-type: none"> <li>• Incur/damages of/by \$1 million to \$10 million</li> <li>• Serious injuries to public/staff</li> <li>• Loss of large, but replaceable, physical assets</li> <li>• Moderate environmental damage with the moderate clean-up effort, no permanent damage</li> <li>• Moderate exposure to confidential and private information</li> </ul>	<ul style="list-style-type: none"> <li>• Moderate improvements/disruptions in mandated services</li> <li>• Some gain/loss of service knowledge or data</li> <li>• Some over/underachievement of service objectives</li> <li>• Cost savings/overruns in delivery of services of \$1 to \$10 million over three years or project life</li> <li>• Additional revenue of \$1 to \$10 million</li> <li>• Regional impact</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholders concerned, trust recoverable at considerable cost</li> <li>• Positive/negative national media attention</li> <li>• Praise/criticism by review agencies</li> <li>• Strong recommendations from an independent audit</li> <li>• Out-of-court settlement</li> </ul>

<p><b>2. Minor: Requires management through specific monitoring or response procedures</b></p>	<ul style="list-style-type: none"> <li>• Incur/damages of/by \$250,000 to \$1 million</li> <li>• Minor, non-permanent damage requiring minimal clean-up efforts</li> <li>• Minor injuries</li> <li>• Limited loss of physical assets</li> <li>• Small exposure of sensitive information</li> </ul>	<ul style="list-style-type: none"> <li>• Minor improvements/disruption in services, projects or processes</li> <li>• Minor gain/setbacks in the achievement of service objectives</li> <li>• Limited gain/loss of service/service group data</li> <li>• Cost savings/overruns in delivery of services of \$250,000 to \$1 million over three years or project life</li> <li>• Additional revenue of \$250,000 to \$1 million</li> <li>• Multiple communities impacted</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholders surprised, minor gain/setbacks in building client trust</li> <li>• Some favourable/unfavourable local media attention</li> <li>• Some favourable/unfavourable observation by review agencies</li> <li>• Some improvements suggested by independent audit</li> <li>• The threat of legal action</li> </ul>
<p><b>1. Insignificant: Can be managed by routine procedures</b></p>	<ul style="list-style-type: none"> <li>• Incur/damages of/by &lt; \$250,000</li> <li>• Results in no injuries</li> <li>• Minimal loss of physical assets</li> <li>• Very minor, non-permanent environmental damage requiring no clean-up measures</li> <li>• Limited exposure to sensitive information</li> </ul>	<ul style="list-style-type: none"> <li>• No or very minor improvement in services, projects or processes</li> <li>• Very minor gain/loss of service data</li> <li>• Very minor cost savings/overruns in delivery of services of less than \$250,000 over three years or project life</li> <li>• Additional revenue of less than \$250,000</li> <li>• Local impact</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholders disappointed but trust recoverable</li> <li>• Very minor impact on client trust</li> <li>• Very minor media attention</li> </ul>