



## **French Language Services Policy**

### **Policy & Procedures**

|                           |            |
|---------------------------|------------|
| <b>Policy No.</b>         | FLS 201    |
| <b>Approval Committee</b> | Leadership |
| <b>Approval Date</b>      | May 2024   |
| <b>Next Review Date</b>   | May 2026   |

**Accountable To:** President & CEO

**Key Policy Issues:**

- Commitment to:
- a) Provision of French language services to home and community care clients as per section 29.1 of Regulation O. Reg. 187/22 under the Connecting Care Act, 2019.
  - b) Active offer
  - c) Leadership team actively supporting employees through education



## TABLE OF CONTENTS

|  |          |
|--|----------|
| <b>1. PURPOSE</b>  | <b>4</b> |
| <b>2. SCOPE</b>  | <b>4</b> |
| <b>3. POLICY STATEMENT</b>   | <b>4</b> |
| <b>4. DEFINITIONS</b>  | <b>4</b> |
| 4.1 Active offer   | 4        |
| 4.2 Designated Bilingual Position (DBP)  | 4        |
| 4.3 Designated Areas (DA)  | 4        |
| 4.4 Francophone  | 5        |
| 4.5 Senior Leadership  | 5        |
| 4.6 Service Provider Organizations (SPO)                                       | 5        |
| 4.7 NHI Staff  | 5        |
| 4.8 Preferred official language  | 5        |
| <b>5. PROCEDURE</b>  | <b>5</b> |
| 5.1 Governance   | 5        |
| 5.2 Leadership   | 5        |
| 5.3 Reporting  | 6        |
| 5.4 Planning   | 6        |
| 5.5 Patient Services   | 6        |
| 5.6 Access to French Speaking NHI Staff  | 7        |
| 5.7 Communications   | 7        |
| 5.8 Patient Relations  | 7        |
| 5.9 Patient Experience   | 7        |
| 5.10 Community Engagement  | 8        |
| 5.11 Business Analytics  | 8        |
| 5.12 Responsibilities of Staff   | 8        |
| 5.13 Active Offer Training   | 8        |
| 5.14 Ongoing Updates   | 8        |
| 5.15 Language Skills Development   | 8        |
| 5.16 Human Resources / Staffing  | 9        |
| 5.17 Identification of Francophone & Bilingual Staff                           | 9        |
| 5.18 Recruitment   | 9        |
| 5.19 Evaluation and Selection of Candidates for Designated Bilingual Positions | 9        |

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***French Language Services Policy***

5.20 French Language Services Committees .....9

5.21 Inclusive Culture and French Services for NHI Staff ..... 10

5.22 Supplies and Equipment ..... 10

**6. DOCUMENT CONTROL RECORD .....10**

6.1 References..... 10

*French Language Services Policy*

**1. PURPOSE**

The purpose of the Provincial French Language Services (FLS) policy is to ensure that Service Provider Organizations (SPOs) fully meet its obligations as Healthcare Services Providers under the French Language Services Act (FLSA), Section 29.1 of Regulation O.Reg.187/22 under the Connecting Care Act, 2019, and Active Offer Regulations in actively offering our services in both official languages. Nursing & Homemakers Inc. (NHI) recognizes that language and culture are essential in the provision of health care services. Access to high-quality health services offered in French is necessary to achieving its vision of providing excellence in nursing practice and personal care in Ontario. This policy enables a consistent, inclusive and equitable approach to the provision of French Language Services in meeting the needs of our Francophone patients, their families, and caregivers, in the homes and communities that NHI services.

**2. SCOPE**

This policy applies to all employees of Nursing & Homemakers Inc.as indicated in this document.

**3. POLICY STATEMENT**

Nursing & Homemakers Inc. (NHI) is committed to active offer to ensure effective delivery of services to Francophone patients, families, and caregivers.

**4. DEFINITIONS**

**4.1 Active offer**

Active offer means that FLS are offered to the patient/family upon first contact and throughout their patient journey. The onus is on NHI as a Service Provider Organization (SPO) to actively offer services in French, rather than wait for the patient, family member, caregiver or health care partner to request it. Active offer of health services in French is the regular and permanent offer of services to the Francophone population. Active offer of services respects the principle of equity, aims for service quality comparable to that provided in English, is linguistically and culturally appropriate to the needs and priorities of Francophones, and an important contributing factor to their safety.

**4.2 Designated Bilingual Position (DBP)**

Designated Bilingual Positions are those that are identified as requiring French language proficiency in order to serve our French speaking population and ensure service continuity. Each designated bilingual position requires a specific level of French language proficiency for oral and/or written skills as defined by the position, the linguistic profile of the community, and the level of interaction with patients, family member and the public.

**4.3 Designated Areas (DA)**

In 1986, the French Language Services Act [Designated Specific Areas](#) (In 2022 there are 26 areas) where FLS must be provided by government agencies. About 80% of Franco-

*French Language Services Policy*

Ontarians live in a designated area. For an area to obtain designation, French-speaking residents must usually make up at least 10% of the population. In urban centres, the French-speaking population must usually be at least 5,000.

**4.4 Francophone**

People whose mother tongue is French, as well as those whose mother tongue is neither French nor English but who have a particular knowledge of French as an official language and use French at home.

**4.5 Senior Leadership**

Refers to NHI's Chief Executive Officer (CEO), Vice-President and Manager level roles.

**4.6 Service Provider Organizations (SPO)**

Refers to all service providers contracted by HCCSS to deliver home and community care services to patients.

**4.7 NHI Staff**

Refers to all front-line patient services delivered by individuals directly employed by NHI which may include, but is not limited to, Nursing Supervisors, Nurse Educators, Nurses, and Personal Support Workers.

**4.8 Preferred official language**

Refers to the language the patient identifies as being the language in which the patient is most comfortable receiving their home community care services. It is a very important patient centered question that aims to make sure that the patient can communicate effectively with their health care provider, understand the services provided (including care instructions) and give informed consent.

**5. PROCEDURE**

**5.1 Governance**

The Leadership Team demonstrates knowledge and support of Nursing & Homemakers Inc. (NHI) to fully meet its obligations as a Healthcare Service Provider under the FLSA. The Leadership Team is informed and receives an annual report on the implementation of French Language Health Services (FLHS) in NHI. The Leadership Team plays a key role in ensuring expectations are communicated throughout the organization and ensures accountability on all parameters of this Policy.

**5.2 Leadership**

Representation of Francophone and French speaking leaders within the organization from the Manager level and above brings a skill set of French speaking ability that serves to advance the development of, and compliance with French Language Services policies and

procedures throughout the organization.

### 5.3 **Reporting**

The Annual French Language Health Services Report, is reported through the Ministry of Health's French Language Health Services Database (FLHSD). This report will be presented annually to the Leadership Team.

An annual report on French Language Services is also to be produced for the Ministry of Francophone Affairs, coordinated by the manager of NHI's francophone services.

Nursing & Homemakers Inc. (NHI) will report its compliance with the requirements for the delivery of French Language Services on an annual basis via the Service Provider Annual Report template.

Progress made on FLS commitments is reported through the Annual Business Plan as a priority.

### 5.4 **Planning**

Nursing & Homemakers Inc. (NHI) works with the French Language Service Entities to embed the FLS perspective in health system processes, structures and programs that are part of the organization's mandate.

The Annual Business Plan defines a focus on FLS delivery, outlining efforts planned for the year ahead.

Annual reporting on FLS services is sent to the Office of French Language Services at the Ministry of Health through the French Language Health Services Database. Reports generated are shared with the Provincial FLS Committee for review and recommendations, as well as the Senior Leadership Team.

### 5.5 **Patient Services**

Nursing & Homemakers Inc. (NHI) has an obligation to provide active offer to its callers seeking information and/or referral related to patient services.

By making a verbal active offer on first point of contact and at every step along the patients' journey, NHI assumes the responsibility to determine the preferred official language of the patient, caller or member of the public who requests our services.

An active offer means that NHI is accountable to indicate that services are available in both French and English, and to inquire, determine and confirm the patient's language preference, as opposed to the onus being on the patient to request access to services in either official language. After patient indicates preference for FLS, this preference is

recorded in the Client Health and Related Information System (CHRIS)/GoldCare (GC) so that all future communications continue in French, including the provision of patient information and patient care plan. NHI enables CHRIS/GC settings to record mother tongue, oral, and written preferences of patients and substitute decision maker/primary contact (if applicable).

#### 5.6 **Access to French Speaking NHI Staff**

Once preferred language of service has been identified as French, the patient is assigned NHI staff who will provide services in French. Alternate local bilingual or Francophone NHI staff within the client's geography may be used to support the provision of care as needed.

#### 5.7 **Communications**

Nursing & Homemakers Inc. ensures that the public and patient facing materials it produces are available in both official languages. This includes, but is not limited to:

- Inquiries made through Reception;
- Automated Messages / Voice Mail, as appropriate within designated areas;
- Visual identify and public facing documents including signage, display stands, posters, banners, press releases, brochures, local and provincial websites and other documents released to the public including promotional materials and social media platforms;
- Patient information materials such as the Patient Bill of Rights, Patient Welcome booklets, patient handouts, thank you cards, sympathy cards, and other patient facing documents;
- Job postings and promotion of job postings for any designated bilingual positions and others where operationally feasible;
- Care planning and discharge documents.

Correspondence, including voicemail, email and letters received in French from patients, families, caregivers, health system partners, MPPs, and the media are automatically responded to in French.

#### 5.8 **Patient Relations**

NHI Staff representatives address complaints specifically about the receipt of services in French. Should these complaints not be resolvable by staff, the local complaint is escalated to the CEO.

#### 5.9 **Patient Experience**

Patient experience feedback surveys are provided/administered to Francophone patients, families, and caregivers in French and include the evaluation of patient satisfaction on the delivery of services in French.

#### 5.10 **Community Engagement**

NHI takes into account the cultural realities and perspectives of Francophones, responds to their needs and demonstrates a commitment to active engagement of the Francophone population in community engagement activities, including translation of materials and enabling participation in French. NHI collaborates with the French Language Health Planning Entities to ensure we are meeting the needs of Francophone patients in our communities.

#### 5.11 **Business Analytics**

Databases and platforms used by NHI staff will have the ability to track and share information about unique patients served who are Francophone. All data indicators should be able to be tracked by linguistic preference. This data will be embedded into reporting.

#### 5.12 **Responsibilities of Staff**

All NHI staff:

- Are orientated to their obligations under the FLSA and Connecting Care Act, 2019 and Regulations, and Active Offer Regulations. Staff shall demonstrate appropriate knowledge and awareness of the roles and responsibilities of NHI with respect to the provision of FLS.
- Complete training on the Provincial FLS Policy, active offer training and refresher courses as assigned
- Apply and promote the principles of active offer throughout the health care system.
- Respect the language of correspondence from the public and patients, families, and caregivers by ensuring that all correspondence received in French is answered in French within the same response times as English correspondence.

#### 5.13 **Active Offer Training**

All staff, including new hires, shall receive active offer training with a desired completion rate of 100%. Training highlights the importance of linguistic and cultural competency in ensuring positive experiences and outcomes of care.

#### 5.14 **Ongoing Updates**

As required, the manager of NHI's Francophone services provides ongoing education to keep NHI staff informed of changes in legislation, new processes, and projects related to French Language Services.

#### 5.15 **Language Skills Development**

NHI encourages employees to develop their French language skills. Depending on their role and function, interested employees should consult with their manager or supervisor.



**5.16 Human Resources / Staffing**

Human Resources supports an enhanced focus on recruitment, training and development of a Francophone and bilingual workforce.

**5.17 Identification of Francophone & Bilingual Staff**

Human Resources works with the Care Coordinators to identify which roles within the organization should be designated bilingual and what level of proficiency is required.

Human Resources maintains a record of Designated Bilingual Positions (DBPs) and bilingual staff and is able to provide Care Coordinators with a current inventory of bilingual staff that can be connected to any patient, family, caregiver, or member of the public who wishes to receive service in French.

**5.18 Recruitment**

As we work towards building a bilingual workforce, efforts will be made to post Designated Bilingual Positions (DBPs) and other positions in French and English where operationally feasible. Every position posted or advertised will specify language requirements.

Job postings for DBPs indicate that bilingualism is a requirement of employment. In some instances, job postings for positions that are not DBPs may indicate that bilingualism is an asset (as opposed to a requirement).

Targeted recruitment efforts may be required in order to elicit the desired Francophone candidates for designated positions. Human Resources identifies and leverage local and regional Francophone resources to maximize targeted recruitment.

**5.19 Evaluation and Selection of Candidates for Designated Bilingual Positions**

There are three elements to recruitment for DBPs with regards to French language abilities: screening, interviews and proficiency testing.

- Interviews are conducted with candidates as part of the selection process. Human Resources staff conducting the interviews will endeavor to speak with candidates for DBPs in French to informally screen French oral comprehension and expression skills.
- Human resources staff will endeavour to ensure that the informal assessments provided at the phone screen and / or interview stage help determine whether the candidate's French language skills are adequate to consider for testing
- Formal language testing will occur before an offer of employment is made. Human Resources will schedule language testing.

**5.20 French Language Services Committees**

The Provincial FLS Committee supports a consistent, inclusive and equitable approach to the delivery of FLS thus meeting the needs of our Francophone patients, their families,

and caregivers. The work of this Committee presents an opportunity for building on best practices as our organization works as one.

#### 5.21 **Inclusive Culture and French Services for NHI Staff**

For internal operations purposes, English is the language of business at NHI. However, NHI is committed to – and fosters – a culture of inclusiveness and encourages interaction in both official languages.

Employees may request access to information related to pension, benefits, and employee assistance programs in both official languages.

#### 5.22 **Supplies and Equipment**

Appropriate supplies and equipment are available to staff to ensure quality FLS can be provided. These may include, but are not limited to, software, dictionaries and reference documents.

### 6. **DOCUMENT CONTROL RECORD**

#### 6.1 **References**

- a) **Ontario Government:** French Language Services Act, Ontario Regulation 407/94, Designation of Additional Areas.  
<https://www.ontario.ca/laws/regulation/940407>
- b) **Ontario Government:** Provision of French Language Services on Behalf of Government Agencies: French Language Services Act, O. Reg. 284/11.  
<https://www.ontario.ca/laws/regulation/110284>
- c) **Ontario Government:** Home and Community Care Services, Connecting Care Act, 2019, O. Reg. 187/22  
<https://www.ontario.ca/laws/regulation/r22187>