

**Q1 Do you have feedback for consideration when developing the Customer Service & Communications Department budget? Submit your feedback below. All feedback will be provided to elected officials on the Executive Policy Committee during their budget discussions. Submit your feedback by Friday, November 29.**

Answered: 4 Skipped: 0

#	RESPONSES	DATE
1	<p>I have lived in Winnipeg since 2003. My native language is French. I am a professional translator. I have worked as a translator, both internally and as a contractor. I am opposed to the recommendation made to EPC to mostly outsource translation in French. I think it would create problems, and it concerns me. In Winnipeg, there are more and more people who are more comfortable speaking in French than in English. A lot of them are newcomers to Manitoba or to Canada. It is vital to inform them about the services that the City provides, or to provide them with services in French, because it helps their integration, and their participation as citizens and residents of Winnipeg. To achieve that, there needs to be bilingual front-line staff to communicate information clearly, precisely, and in a uniform fashion, when they answer questions pertaining to utility bills and taxes, and these bilingual staffs needs centralised linguistic and terminological support. Therefore, an internal translation team is a vital tool for them, and helps the city be more efficient. Other services at stake relate to the enforcement of by-laws on Neighbourhood liveability, zoning, parking, pets. Without internal translation, the City's provision of French language services would hurt. It would be difficult to improve and develop them. French-speaking folks would have more hurdles, and low-income families would likely be hit harder. This reflects negatively on the City, who heavily promotes diversity and equity. The City's by-law on official languages, which seeks to apply the requirements of the Winnipeg Charter, commits the City to offer French services that are of equivalent quality as to those offered in English. This is another reason why outsourcing is inadvisable. The recommendation is largely inspired by what the Province did about a year ago (they deleted most of their translator positions, except one person, who does some translation, as well as the revision of the freelancers' translations). They have apparently increased their production since then, which could mean that everything is not proofread. Freelancers rarely proofread their work. They wouldn't know how the City works, its communications standards, its organisational structure, etc. Contractors from out of province (a recourse the Province had to use) are even more out-of-touch with Winnipeg realities, terminology and its information hubs such as websites, apps, and social media accounts. Contractors seldom ask questions, as they don't have easily access to the experts. And who will define the standards that should be adopted by the city in terms of French communications? Who will manage terminology? Who will pay the freelancers? How to find money elsewhere: Raise property tax (with a subsidy program for low income families) Raise business tax Borrow from capital budget Consider cutting other non-essential services under this departmental budget: Marketing? Invest in public transportation Other comments: The online information on how to appear as a delegation is incomplete (EPC is not presented as an option), and nowhere on the site does it say that delegations need to apply 48hrs in advance if they wish to make a presentation in French. I know that some delegations were told at the last minute that their presentation in French had to be made in English, which is unfair, because it is quite difficult to be put on the spot to defend a cause, when one cannot do so in their native language, and the other parties can.</p>	11/30/2019 4:46 AM

## Feedback on the Customer Service & Communications Department budget

2	<p>* Please note: This is the English version of the letter I submitted through the French survey. I am submitting this version for those who may not speak French. Dear members of City Council: I'm writing this letter to try to explain why, in my opinion, it is vital for the Francophone community that translation services remain internal. Difference between internal and external translation Outsourcing translation services reduces the quality of French-language services in three ways. First of all, it forces translators to compete for the lowest rate. Therefore, translators have to produce at an accelerated rate, which leads to mistakes and lowered quality. Above all, the Francophone community deserves to receive reliable French content from the City of Winnipeg. Furthermore, it creates a situation in which French-language services are offered by people who may be trained in translation, but don't have an internal knowledge of the City of Winnipeg. This cannot be compared to the work that is accomplished by an internal team that has an in-depth knowledge of the organization, the way it operates, its image, its standards and its values. Finally, it affects the consistency of terminology. It's already quite difficult for Francophones living as a minority to be familiar with the terminology needed to express themselves in their first language. Many Francophones suffer from what is referred to as linguistic insecurity when it comes to using their first language, since expressing yourself in a underrepresented language is a significant challenge. This will only get worse if the City of Winnipeg starts offering content and terminology that is produced in a non-centralized way. Equivalence between English-language and French-language services The Official Languages of Municipal Services By-law states that "the City of Winnipeg is committed to providing French language services that are equally accessible and of comparable quality to those available in the English language"*. First, accessibility. The vast majority of services offered by the City of Winnipeg are English-language services. Indeed, every department is a centralized source of English-language services. Up until now, the translation office was the centralized source of French-language services that was offered to Francophones. However, the new proposal dismantles this centralized source of French-language services, and replaces it almost entirely with scattered, disconnected French-language services. In what way does this constitute equally accessible services in both official languages? Secondly, quality. At the City of Winnipeg, English-language services, i.e. the vast majority of services, are provided by City of Winnipeg employees who have expert knowledge of the City as an organisation. Indeed, English-language services are provided by employees who can work together and provide consistent content, and who have a good understanding of the way the City of Winnipeg functions, as well as of its values and its image. If translation services are almost entirely outsourced, Francophones will not be entitled to any of this. In what way does this constitute equal quality of services in both official languages? Rights of Francophone workers in Manitoba If outsourcing translation services is less expensive, it's because no benefits, no job security and no pension is offered to workers. Furthermore, workers are forced to compete for the lowest rate, which devalues the field. Is this really the legacy we as Manitobans want to leave to future generations of Francophones? There are already few French-language jobs in Manitoba. Do we really want to divest from the few jobs that offer stability to the Francophone workforce and replace them with precarious work? Is this really the best way to help the Francophone community flourish? The Francophone community needs stability. And for this, French labour must first and foremost be rich, varied, stable and flourishing. Will Franco-Manitobans pursue translation if only precarious work is left in the province? And if they do pursue translation, will they stay in Manitoba after the fact? Will the City of Winnipeg's outsourced translation services even remain in Manitoba, or will they be sent to Quebec? Will we slowly but surely lose our French workforce in Manitoba? Finances I understand that the City of Winnipeg is in a difficult financial situation. However, there are solutions that would increase the City's revenue instead of diminishing the quality of its services, especially when it comes to the few services that are offered to a minority culture. As a homeowner, I would willingly pay more property tax if this meant ensuring the wellbeing of my French community, since the survival of my culture means everything to me, and I'm convinced that this would be the best option in the long run. Furthermore, where will the funds needed to outsource translation come from? Was a budget created for this? And if so, why would the City choose to spend this money outside of the organization instead of investing it in a stable, permanent team composed of City of Winnipeg employees? Defending the French community I have faith that the French language and the French community are important to City Council. I'm hopeful that you all understand the history and the value of the Francophone community, the challenges it faces, and the extent to which it values its language. The proposed cuts aren't simply cuts among others. They are injuries that will affect my minority community in a disproportionate way. I hope I can count on you to defend us as a community. Thank you. * Source: <a href="http://clkapps.winnipeg.ca/dmis/documents/docext/bl/2002/2002.8154.pdf">http://clkapps.winnipeg.ca/dmis/documents/docext/bl/2002/2002.8154.pdf</a></p>	11/30/2019 12:24 AM
3	<p>I believe that a bilingual province and a bilingual city should provide internal services in both French and English. French speaking citizens should be provided with services in their preferred language from fellow Manitoban's just like English speaking citizens are provided services in their preferred language. To provide those internal services and provide sustainability to the French community the city needs to protect French-language jobs.</p>	11/29/2019 11:18 PM
4	<p>Budgets should not be cut and taxes should be increased. We need our services.</p>	11/28/2019 5:05 PM

## **Feedback originally submitted in French and translated to English:**

1. I have lived in Winnipeg since 2003. My native language is French. I am a professional translator. I have worked as a translator, both internally and as a contractor. I am opposed to the recommendation made to EPC to mostly outsource translation in French. I think it would create problems, and it concerns me. In Winnipeg, there are more and more people who are more comfortable speaking in French than in English. A lot of them are newcomers to Manitoba or to Canada. It is vital to inform them about the services that the City provides, or to provide them with services in French, because it helps their integration, and their participation as citizens and residents of Winnipeg. To achieve that, there needs to be bilingual front-line staff to communicate information clearly, precisely, and in a uniform fashion, when they answer questions pertaining to utility bills and taxes, and these bilingual staffs need centralised linguistic and terminological support.

Therefore, an internal translation team is a vital tool for them, and helps the city be more efficient. Other services at stake relate to the enforcement of by-laws on Neighbourhood liveability, zoning, parking, pets. Without internal translation, the City's provision of French language services would hurt. It would be difficult to improve and develop them. French-speaking folks would have more hurdles, and low-income families would likely be hit harder.

This reflects negatively on the City, who heavily promotes diversity and equity. The City's by-law on official languages, which seeks to apply the requirements of the Winnipeg Charter, commits the City to offer French services that are of equivalent quality as to those offered in English. This is another reason why outsourcing is inadvisable. The recommendation is largely inspired by what the Province did about a year ago (they deleted most of their translator positions, except one person, who does some translation, as well as the revision of the freelancers' translations). They have apparently increased their production since then, which could mean that everything is not proofread.

Freelancers rarely proofread their work. They wouldn't know how the City works, its communications standards, its organisational structure, etc. Contractors from out of province (a recourse the Province had to use) are even more out-of-touch with Winnipeg realities, terminology and its information hubs such as websites, apps, and social media accounts.

Contractors seldom ask questions, as they don't have easy access to the experts. And who will define the standards that should be adopted by the city in terms of French communications? Who will manage terminology? Who will pay the freelancers? How to find money elsewhere: Raise property tax (with a subsidy program for low income families) Raise business tax Borrow from capital budget Consider cutting other non-essential services under this departmental budget: Marketing? Invest in public transportation Other comments: The online information on how to appear as a delegation is incomplete (EPC is not presented as an option), and nowhere on the site does it say that delegations need to apply 48hrs in advance if they wish to make a presentation in French. I know that some delegations were told at the last minute that their presentation in French had to be made in English, which is unfair, because it is quite difficult to be put on the spot to defend a cause, when one cannot do so in their native language, and the other parties can.

## **Feedback originally submitted in French and translated to English**

2. The Société de la francophonie manitobaine (SFM) is very concerned by the cuts that have been proposed as part of the City of Winnipeg's 2020-2023 multi-year budget process.

The SFM specifically opposes the recommendations made to the City of Winnipeg's Executive Policy Committee by the Customer Service and Communications Department.

- Context -

In order to provide some background information, we would like to recall the City's obligations.

Part 9 of the City of Winnipeg Charter lists the requirements for municipal services and official languages. It also specifies that the official languages are French and English. The City of Winnipeg shall ensure: that all things necessary are provided or done to satisfy the requirements of this Part [9] and to permit a person to do anything he or she is entitled to do under this Part.

Therefore, the City has to fulfill certain obligations, particularly with regards to the activities of City Council and its committees, to communications, to municipal services and to bilingual documents. To fulfill those obligations, the City of Winnipeg adopted a by-law for the provision of municipal services in both official languages, By-law 8154/2002. In this by-law, the City of Winnipeg commits to providing French language services in accordance with the active offer principle, and to providing French language services that are equally accessible and of comparable quality to those available in the English language.

As Justice Chartier confirms in the decision by the Court of Appeal for Manitoba regarding the case *R. v. Rémillard (R.) et al.* (2009 MBCA 112 subsec. 46-47), the principles [of law] applicable in matters of language should reflect judgement *DesRochers v. Canada (Industry)*, 2009 SCC 8 (CanLII), [2009] 1 SCR 194, in which Justice Charron states (subsec. 31):

Before considering the provisions at issue in the case at bar, it will be helpful to review the principles that govern the interpretation of language rights provisions. Courts are required to give language rights a liberal and purposive interpretation. This means that the relevant provisions must be construed in a manner that is consistent with the preservation and development of official language communities in Canada (*R. v. Beaulac*, 1999 CanLII 684 (SCC), [1999] 1 S.C.R. 768, at para. 25). Indeed, on several occasions this Court has reaffirmed that the concept of equality in language rights matters must be given true meaning (see, for example, *Beaulac*, at paras. 22, 24 and 25; *Arsenault-Cameron v. Prince Edward Island*, 2000 SCC 1 (CanLII), [2000] 1 S.C.R. 3, at para. 31). Substantive equality, as opposed to formal equality, is to be the norm, and the exercise of language rights is not to be considered a request for accommodation.

This is why it's important to recall how important it is for the City of Winnipeg to provide French language services of equivalent accessibility and quality to those offered in English. The administration must therefore have human and financial resources in place to ensure that services are delivered according to the Charter, at least in the "designated area".

- Current situation -

The City is recommending reducing its investment in translation services. However, many City of Winnipeg documents are not accessible in French. A basic comparison of the documents that the City provides in French and English clearly demonstrates that the provision of French language services that are accessible and comparable to those offered in English is still not a reality.

We do not understand how the City of Winnipeg could justify such disinvestment in French language services when substantive equality has still not been achieved. We noticed for instance that the presentations made as part of the City of Winnipeg's budget process are only accessible in English. This kind of negligence means that the principle of active offer is being ignored by the City of Winnipeg, and actively discourages the Francophone residents of Winnipeg, especially those from the Riel Community, from taking part in a consultation process. In the last annual report on municipal French language services (from 2017, as the 2018 report does not seem to be available yet), a department like the Planning, Property and Development Department has not even filled 50% of the bilingual positions that must be filled according to By-law No. 8154/2002. The impact is real and direct on service delivery in the Riel Community, and the City of Winnipeg's communications and permits are often in English only, as a request for a permit in French would cause delays that would be detrimental to those residents who need deadlines that are comparable to those that English-speaking residents receive.

## Feedback originally submitted in French and translated to English

2. continued

When the residents from the “designated area” are asked to request, in several cases, services in French, and to submit a complaint if the service is not available or inferior, we have a system that doubly punishes the Francophone community of Winnipeg. The residents who speak English do not have to choose between equity and timeliness.

This is why a disinvestment in French language services at the City of Winnipeg does not make any sense. Even with the resources currently in place, the demand for translation is already greater than the supply. By making cuts to translation services to save money, the City of Winnipeg would make an illogical decision and violate its obligations.

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i. L.M. 2002, c. 39, p 9.

ii. L.M. 2002, c. 39, p 9(451)(2).

iii. L.M. 2002, c. 39, p 9(452)(1).

iv. L.M. 2002, c. 39, p 9(453)(1-2).

v. L.M. 2002, c. 39, p 9(454)(1-5).

vi. L.M. 2002, c. 39, p 9(455)(1-4).

vii. L.M. 2002, c. 39, p 9(457)(1-3).

viii. City of Winnipeg By-law No. 8154/2002

ix. Justice Chartier, in *R. v. Rémillard (R.) et al.*, 2009 MBCA 112, states (subsec. 49): In 2002, the City committed to provide French language services in certain areas of the city. It inspired itself from the concept of territorial bilingualism, and claimed that its linguistic commitments were limited to the residents of the Riel Community “designated area” (that is, St. Boniface Ward, St. Vital Ward and St. Norbert Ward). Besides, the City’s bilingual “designated area” is identical to the designated area defined in the Province of Manitoba’s 1999 French-Language Services Policy. The Province has designated its bilingual areas based on a geographical and linguistic reality, or, as per the Policy, where the French-speaking population is concentrated (subsec. 50). Moreover, it has been clearly established that, with respect to the bilingual designated areas, the official languages are French and English [L.M. 2002, c. 39, p 9(451)(2)], and that the City is committed, according to its by-law, to:

1) normalizing the use of the French language in the delivery of municipal services within the designated area; and

2) providing French language services that are equally accessible and of comparable quality to those available in the English language (subsec. 51). To me, this means that the Justice intended to get to a kind of bilingualism that respects the principle of substantive equality in the bilingual designated area. It is also clear that the City’s commitment is limited to this designated area, and does not apply to the other neighbourhoods of Winnipeg.

x. L.M. 2002, c. 39, p 9(451)(1).

xi. However, the City of Winnipeg Charter states (subsec. 462): The council shall annually, not later than four months after the end of each fiscal year of the city, make a report in English and French to the minister respecting the compliance by the city with its obligations under this Part, and that report shall include particulars of any complaints under this Part filed with the city ombudsman and the disposition of each of those complaints.

## Feedback originally submitted in French and translated to English

3. \* Please note: This is the English version of the letter I submitted through the French survey. I am submitting this version for those who may not speak French.

Dear members of City Council:

I'm writing this letter to try to explain why, in my opinion, it is vital for the Francophone community that translation services remain internal.

Difference between internal and external translation

Outsourcing translation services reduces the quality of French-language services in three ways.

First of all, it forces translators to compete for the lowest rate. Therefore, translators have to produce at an accelerated rate, which leads to mistakes and lowered quality. Above all, the Francophone community deserves to receive reliable French content from the City of Winnipeg. Furthermore, it creates a situation in which French-language services are offered by people who may be trained in translation, but don't have an internal knowledge of the City of Winnipeg. This cannot be compared to the work that is accomplished by an internal team that has an in-depth knowledge of the organization, the way it operates, its image, its standards and its values.

Finally, it affects the consistency of terminology. It's already quite difficult for Francophones living as a minority to be familiar with the terminology needed to express themselves in their first language. Many Francophones suffer from what is referred to as linguistic insecurity when it comes to using their first language, since expressing yourself in a underrepresented language is a significant challenge. This will only get worse if the City of Winnipeg starts offering content and terminology that is produced in a non-centralized way.

Equivalence between English-language and French language services

The Official Languages of Municipal Services By-law states that "the City of Winnipeg is committed to providing French language services that are equally accessible and of comparable quality to those available in the English language".

First, accessibility. The vast majority of services offered by the City of Winnipeg are English-language services. Indeed, every department is a centralized source of English-language services. Up until now, the translation office was the centralized source of French-language services that was offered to Francophones. However, the new proposal dismantles this centralized source of French-language services, and replaces it almost entirely with scattered, disconnected French-language services. In what way does this constitute equally accessible services in both official languages?

Secondly, quality. At the City of Winnipeg, English-language services, i.e. the vast majority of services, are provided by City of Winnipeg employees who have expert knowledge of the City as an organisation. Indeed, English-language services are provided by employees who can work together and provide consistent content, and who have a good understanding of the way the City of Winnipeg functions, as well as of its values and its image. If translation services are almost entirely outsourced, Francophones will not be entitled to any of this. In what way does this constitute equal quality of services in both official languages? Rights of Francophone workers in Manitoba If outsourcing translation services is less expensive, it's because no benefits, no job security and no pension is offered to workers. Furthermore, workers are forced to compete for the lowest rate, which devalues the field. Is this really the legacy we as Manitobans want to leave to future generations of Francophones? There are already few French-language jobs in Manitoba. Do we really want to divest from the few jobs that offer stability to the Francophone workforce and replace them with precarious work? Is this really the best way to help the Francophone community flourish? The Francophone community needs stability. And for this, French labour must first and foremost be rich, varied, stable and flourishing. Will Franco-Manitobans pursue translation if only precarious work is left in the province? And if they do pursue translation, will they stay in Manitoba after the fact? Will the City of Winnipeg's outsourced translation services even remain in Manitoba, or will they be sent to Quebec? Will we slowly but surely lose our French workforce in Manitoba?

## Feedback originally submitted in French and translated to English

### 3. continued

Finances I understand that the City of Winnipeg is in a difficult financial situation. However, there are solutions that would increase the City's revenue instead of diminishing the quality of its services, especially when it comes to the few services that are offered to a minority culture. As a homeowner, I would willingly pay more property tax if this meant ensuring the wellbeing of my French community, since the survival of my culture means everything to me, and I'm convinced that this would be the best option in the long run. Furthermore, where will the funds needed to outsource translation come from? Was a budget created for this? And if so, why would the City choose to spend this money outside of the organization instead of investing it in a stable, permanent team composed of City of Winnipeg employees? Defending the French community I have faith that the French language and the French community are important to City Council. I'm hopeful that you all understand the history and the value of the Francophone community, the challenges it faces, and the extent to which it values its language. The proposed cuts aren't simply cuts among others. They are injuries that will affect my minority community in a disproportionate way. I hope I can count on you to defend us as a community. Thank you. \* Source: <http://clkapps.winnipeg.ca/dmis/documents/docext/bl/2002/2002.8154.pdf>

4. I believe that it would be a grave mistake to implement the City of Winnipeg Communications Department's recommendation to eliminate three French translator positions, as it would cause a reduction of French language services, and it would diminish the quality of French. These positions ensure the quality of translation. It is impossible to maintain quality by replacing our experts with freelancers. The City must provide Francophone Winnipeggers with quality French communications, and must maintain this quality without trying to save money on the backs of our French-speaking population.

5. I am disappointed that the City is even considering reducing its translation services. The proposed cuts would negatively impact my life and that of many Manitobans. If our communications are no longer translated by Manitobans, for Manitobans, why even live in Manitoba? We may as well live in Québec, where there are at least more French language services. The proposed cuts and changes are embarrassing.

6. The elimination of translation services will have a very negative impact on the French-speaking community of Winnipeg. In order to keep high quality jobs here, we must invest in services like translation.

7. As a Francophone resident of Winnipeg, and as a translator, I am horrified by the recommendation to reduce the number of translation positions at the City. It is already very difficult to access French language services in Winnipeg, and I cannot be convinced that cutting these jobs won't make things worse.

8. These cuts will undoubtedly damage the quality of the translations provided by the City. What a shame to do so little to value bilingualism in Winnipeg!

## Feedback originally submitted in French and translated to English

9. I am very disappointed to hear that the City of Winnipeg is recommending to get rid of some French translator positions. Every time I need to translate something for my own use, I am reminded of how hard it is. A good, faithful translation requires specialization in translation, as well as a good knowledge of regionalisms and of the subject matter.

I currently live near Île-des-Chênes and work in Winnipeg. In Canada, it is common to come across bad translations that are so literal they read like English. What a shame it would be if that were the case for the City of Winnipeg's official documents. I am proud that the City currently offers high quality information in both official languages.

On the other hand, if French language services are not affected by the translation cuts, one can only infer that the City will end up hiring the same people without offering them job stability and associated social benefits. That is not fair for a professional.

10. I cannot believe that we are going to have to fight the battles we fought 50 years ago to keep our rights.

11. This recommendation is totally unacceptable. Even though there aren't enough French language services to meet the needs of a growing French-speaking population, and the City is trying to compensate by providing translated information where bilingual staff would be required, the City is suggesting penny-pinching where it will have a direct impact on service delivery. This recommendation will undoubtedly have negative impacts on the quality of translations, which means that the City will not meet the requirements of its own by-law on French language services. How will the City ensure that its communications are well translated? Without a solid revision process, the City is more vulnerable to complaints. What's more, there is a risk that the freelancers will not understand the nuances of the political issues at hand. Only an internal translator can handle this type of project safely and efficiently. The City already has too few resources in French, especially in translation. Getting rid of the few existing positions will not help solve the City's financial woes, and will certainly create major problems for the provision of French language services.

12. Winnipeg's French heritage is too important. When Unicity came about, French language services became the responsibility of the City of Winnipeg. There still aren't enough services in French! Also, it is vital for the most vulnerable people to be able to access services in their mother tongue. For them, speaking in English is not an option.

13. It is unacceptable to get rid of translation services!

14. Hello,

I am devastated to hear that the City intends to reduce the number of its internal translators.

The city of Winnipeg has a large, vibrant French-speaking community, it is officially bilingual, and it lives on the Métis land of Louis Riel, who fought to make French an official language in the province of Manitoba.

A reduction of the number of City translators will affect the Francophone community of Winnipeg. It sends the message that we do not matter to the rest of the city.

I am also worried about workers' rights. Your intention to increase the number of translations done externally, instead of internally, by your own employees, means there will be more translators out there working independently and without job security, when they should be guaranteed good stable jobs.

I hope you will reconsider these cuts to French translation services.