

# Knowing One's Community

THROUGH LANGUAGE RIGHTS

Proposed Learning Content



Canadian Teachers' Federation  
Fédération canadienne des enseignantes et des enseignants



FAJEF

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**TABLE OF  
CONTENTS**

Introduction..... 1

Topics Proposed..... 2

Learning Content and Outcomes..... 3

    Introduction: Basic Legal Concepts..... 3

    History of Language Rights..... 6

*Canadian Charter of Rights and Freedoms* ..... 9

    Services in French..... 12

    Citizen Engagement..... 15

Learning Methods..... 18

Teaching Resources..... 19

Jurisprudence..... 20

Other Recommendations..... 23

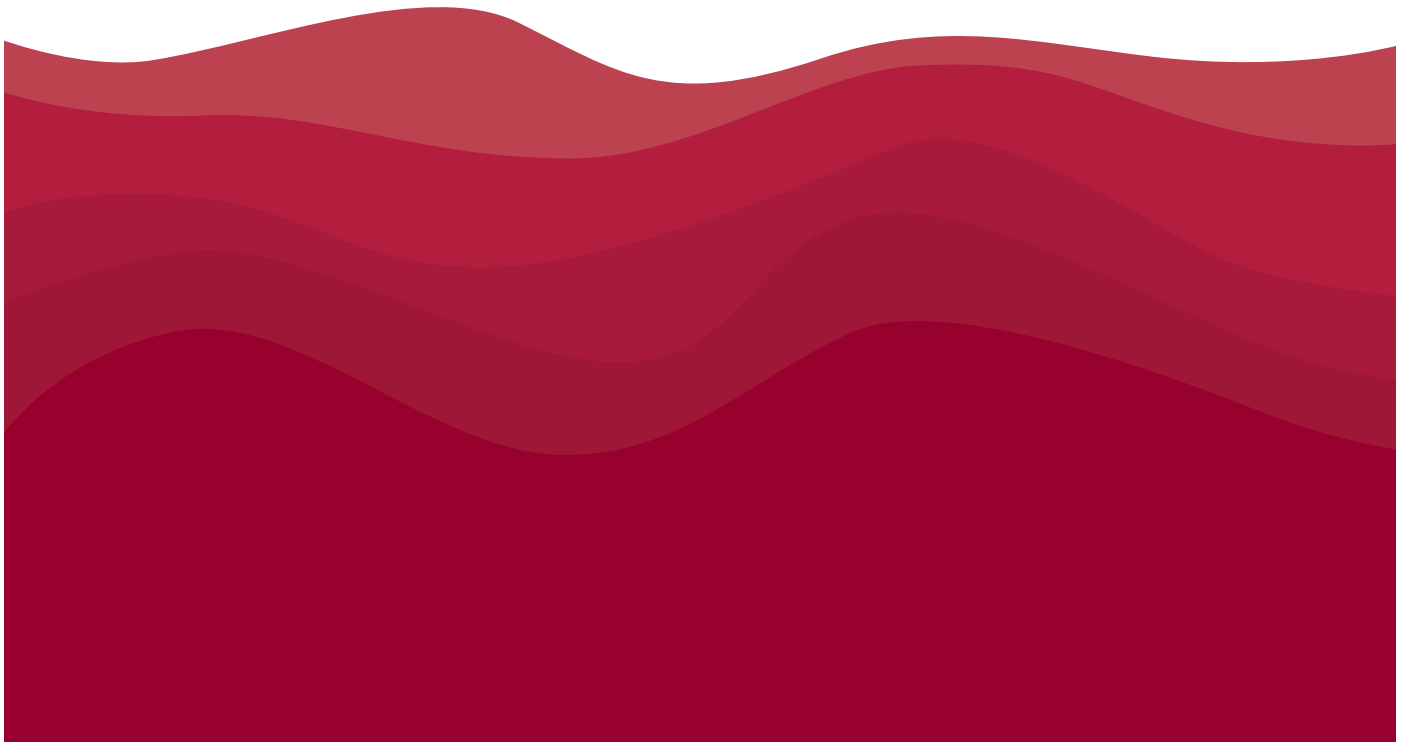
Conclusion..... 24

Sources..... 25

KNOWING ONE'S COMMUNITY THROUGH

# **LANGUAGE RIGHTS**

**Proposed Learning Content**





## INTRODUCTION

French-language schools in minority settings differ from other schools in that they have a dual mission: the academic success of their students and the building of their students' Francophone identity. Over the years, French speakers living in minority communities have had to acquire and assert their rights in order to obtain an education system that fully plays its role in helping students achieve academic success and build their identity.

The recognition of language rights has been at the crux, not just of the development of French-language schools, but also of the development of French-language services across the country.

In this context, it is essential for students to know their language rights and appreciate the importance of getting involved by continuing to assert their rights and making use of expanded services in their language.

A study has revealed that in schools in minority settings, there are no or virtually no programs dealing with language rights, whether as part of a law course or a social studies course. The study's findings are summarized in the report *Knowing One's Community Through Language Rights* published by the Canadian Teachers' Federation (CTF).<sup>1</sup>

A working group made up of teachers and jurists was involved in the present study, and it made the following recommendation:

All curriculum developers in Canada should consider developing a generic theoretical framework for law courses that would specifically serve the needs of French-language schools and would be based on the work of our university researchers.<sup>2</sup>

The working group also stated that:

Law curricula should help students in French-language schools to understand **the role and the main components of our legal system** as they relate to respect for language rights.<sup>3</sup>

Here, this same working group suggests learning content that could guide the conceptual development of a language rights curriculum. It also recommends content on this topic that could be incorporated into existing law or social studies courses. Incorporating material about language rights into compulsory social studies courses would ensure that all students who attend French-language schools in minority settings would have a basic knowledge of their language rights by the time they finish high school.

The working group has taken the opportunity to go somewhat further by suggesting learning outcomes that would ultimately foster students' engagement with their language rights. It also proposes learning methods, teaching resources and a list of relevant legal cases. The case law list is divided up by province and territory, as well as by topic.

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1 Canadian Teachers' Federation, *Knowing One's Community Through Language Rights*, 2016, 14 p.

2 *Ibid.*, p. 13.

3 *Ibid.*

## TOPICS PROPOSED

A course on Francophones' language rights could start by explaining some basic legal concepts. It would then proceed to cover the history of language rights, the enactment of the *Canadian Charter of Rights and Freedoms*, the extent of French-language services and the importance of citizen engagement in the development of these rights.

<b>Introduction: Basic Legal Concepts</b>	
0.1 Sources of Law	0.1.1 Constitution, Laws and Regulations
	0.1.2 Jurisprudence
0.2 Justice System	0.2.1 Courts of Law
	0.2.2 Public Order
<b>1. History of Language Rights</b>	
1.1 Development of Language Rights	1.1.1 Period from 1867 to 1982
	1.1.2 Period from 1982 to the Present
1.2 Sociolinguistic Factors	1.2.1 Canadian Francophonie
	1.2.2 Multiculturalism
<b>2. Canadian Charter of Rights and Freedoms</b>	
2.1 Bilingualism: Federal and New Brunswick Institutions (ss. 16 to 20)	2.1.1 Governments of Canada and New Brunswick
	2.1.2 Justice System
2.2 Right to Instruction in Minority Language (s. 23)	2.2.1 Access to French-Language Schools
	2.2.2 Corrective Principle
<b>3. Services in French</b>	
3.1 Legislative and Regulatory Framework	3.1.1 Federal, Provincial/Territorial and Municipal Public Sectors
	3.1.2 Private Sector
3.2 Active Offer	3.2.1 Government Responsibility
	3.2.2 Demand for Services
<b>4. Citizen Engagement</b>	
4.1 Judicial Remedies	4.1.1 Courts
	4.1.2 Offices of the Commissioner of Official Languages
4.2 Promotion and Political Action	4.2.1 Raising Awareness
	4.2.2 Making Demands and Negotiating

A general law or social studies course could cover some of the topics proposed above. We will indicate which ones after presenting the suggested learning content and outcomes.

# LEARNING CONTENT AND OUTCOMES

## Introduction: Basic Legal Concepts

The law is the body of rules that govern relations between citizens. These rules, which also provide a framework for the functioning of government institutions, are referred to as “rules of law” because they have been adopted by parliaments and courts of law, and are rooted in relations between citizens and in various social, economic and cultural factors.

### Sources of Law

The main sources of law in Canada are the Constitution, federal, provincial and territorial laws, the associated regulations, and jurisprudence.

### Constitution, Laws and Regulations

The Constitution is the supreme law. It defines the areas of jurisdiction of each level of government. The laws and regulations passed by legislators must be consistent with the Canadian Constitution, just as court rulings must.

An act is a rule of law passed by the Parliament of Canada or by a provincial or territorial legislative assembly. The provinces and territories are governed by both federal laws and their own laws. Regulations are legally subordinate to laws. They are often more detailed, more explicit and more concrete than their enabling acts.

### Jurisprudence

Jurisprudence is the body of case law rulings made by courts. Unlike an act, which is general and universal, jurisprudence can be used to develop a general standard based on a specific case. The importance of jurisprudence in common law countries differs from that in civil law countries. In Canada, the two legal traditions coexist.<sup>4</sup>

In common law, jurisprudence, or case law, is the chief source of the establishment of law. In civil law, jurisprudence is not, theoretically, a primary source of law. This means that a civil law judge may rule on a case without taking earlier decisions on the same subject into consideration. [Translation] “However, in actual fact, jurisprudence has become a source of law in civil law tradition countries, too.”<sup>5</sup>

### Justice System

Canada’s justice system relies on the courts and police forces to maintain order.


### Courts of Law

Canada’s court system has four levels: the lower provincial and territorial courts, the superior courts and federal courts, the courts of appeal (federal, provincial and territorial), and the Supreme Court of Canada. The system as a whole is under the authority of the Supreme Court, which is the final court of appeal.

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<sup>4</sup> Canadian Teachers’ Federation, *Knowing One’s Community Through Language Rights*, 2016, 14 p.

<sup>5</sup> [https://modules.fd.ulaval.ca/cycles\\_superieur/](https://modules.fd.ulaval.ca/cycles_superieur/).



The nine judges of the Supreme Court of Canada are appointed by the governor general, on the recommendations from the prime minister of Canada. In actual fact, an independent, non-partisan advisory committee submits a list of candidates from which the prime minister makes a choice. The other federal judges are appointed by the Government of Canada, following a similar procedure. The judges of the provincial and territorial courts of appeal are also appointed by the Government of Canada, whereas judges on the lower courts are appointed by the provincial and territorial governments.

### Public Order

The vast majority of citizens consider the rules of law to be fair and reasonable, and comply with them willingly. A few, however, would not hesitate to violate the rules if doing so did not expose them to penalties. That's why penalties exist, in the form of either fines or terms of imprisonment.

Police forces fulfill several functions, including prevention, investigation, search and arrest. It is also worth noting that in many cases, police ensure public order simply through their presence.

The Royal Canadian Mounted Police (RCMP) is responsible for enforcing federal laws, the laws of seven provinces and territorial laws. Canada's two largest provinces, Ontario and Quebec, as well as Newfoundland and Labrador, have their own provincial police forces. In their respective jurisdictions, these police forces not only enforce provincial penal statutes, but also certain federal laws.

Some municipalities also have their own police forces. Their role is to enforce provincial penal statutes and certain federal laws within municipal limits. Other municipalities have reached agreements with the RCMP to have them enforce those laws within their limits.

***Police forces fulfill several functions, including prevention, investigation, search and arrest. It is also worth noting that in many cases, police ensure public order simply through their presence.***



## Examples of General and Specific Learning Outcomes

<b>Introduction: Basic Legal Concepts</b>	
<p><b>0.1 Sources of Law</b></p> <p>General learning outcome</p> <ul style="list-style-type: none"> <li>Students will be able to name the sources of law.</li> </ul>	<p><b>0.1.1 Constitution, Laws and Regulations</b></p> <p>Specific learning outcomes</p> <p>0.1.1 a) Students will be able to explain the division of powers between the federal government and the provinces and territories.</p> <p>0.1.1 b) Students will be able to describe the legislature's role in the enactment of rules of law.</p> <p>0.1.1 c) Students will be able to distinguish between a constitution, a law and a regulation.</p> <hr/> <p><b>0.1.2 Jurisprudence</b></p> <p>Specific learning outcomes</p> <p>0.1.2 a) Students will be able to explain the role of courts of law in the establishment of rules of law.</p> <p>0.1.2 b) Students will understand the binding nature of a ruling made by a court of law.</p> <p>0.1.2 c) Students will be able to explain the importance of jurisprudence and its impact.</p>
<p><b>0.2 Justice System</b></p> <p>General learning outcome</p> <ul style="list-style-type: none"> <li>Students will be able to describe the justice system.</li> </ul>	<p><b>0.2.1 Courts of Law</b></p> <p>Specific learning outcomes</p> <p>0.2.1 a) Students will be able to describe the different levels of the court system (lower provincial and territorial courts, superior courts and federal courts, courts of appeal, the Supreme Court of Canada).</p> <p>0.2.1 b) Students will be able to explain the procedure for appointing judges.</p> <hr/> <p><b>0.2.2 Public Order</b></p> <p>Specific learning outcomes</p> <p>0.2.2 a) Students will be able to name the main police forces that operate in their community.</p> <p>0.2.2 b) Students will be able to explain police forces' main law enforcement responsibilities.</p>

In principle, a general law course would cover most of these basic concepts. A general social studies course could at least cover the main sources of law.



## History of Language Rights

The rules of law governing language rights are rooted not only in social relations, but also in a variety of sociolinguistic factors.

### Development of Language Rights

It is essential to understand that the *Constitution Act*, passed in 1867, and the *Canadian Charter of Rights and Freedoms* of 1982 have played a fundamental role in the development of language rights in Canada.

#### Period from 1867 to 1982

In 1867, in accordance with the principle of the two founding peoples, French and English became the two languages that could be used in the Parliament of Canada. During the new country's first century, however, the two languages did not enjoy real equal recognition.<sup>6</sup>

In the early 1960s, Quebec began to demand greater recognition of its language and culture. The federal government established the Royal Commission on Bilingualism and Biculturalism, which recommended that French and English be declared official languages of Canada and that a certain linguistic balance be targeted in the federal public service and elsewhere.

To follow up on these recommendations, the Parliament of Canada passed the first *Official Languages Act* in 1969. New Brunswick, which has a large Acadian population, followed suit on the provincial level a few months later. New Brunswick is the only officially bilingual province in Canada.

Both the Canadian and the New Brunswick acts recognize the equality of French and English in all federal and New Brunswick public institutions. They primarily seek to ensure that people have access to services in the official language of their choice. The federal act also established the position of Commissioner of Official Languages, whose role includes overseeing enforcement of the *Act* and investigating public complaints.


#### Period from 1982 to the Present

The *Canadian Charter of Rights and Freedoms*, enacted in 1982, reaffirms the status of French and English as the official languages of Canada and New Brunswick. That means that the statutes, records, journals and reports of the Parliament of Canada and the Legislative Assembly of New Brunswick must be available in both languages. Every citizen is free to use French or English in court and in a parliamentary assembly. Members of the public have the right to demand that the federal and New Brunswick governments serve them in the official language of their choice, under certain conditions in the case of the federal government and at all times in the case of the Government of New Brunswick.

Section 23 of the *Charter* also entitles Canadians to have their children educated in their official language, subject to certain conditions. Since its enactment, this provision has prompted a significant number of legal proceedings.

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<sup>6</sup> French and English also became the languages that could be used in Quebec's National Assembly in 1867 and in Manitoba's Legislative Assembly in 1870. Citizens were also free to use either French or English in federal courts, as well as in the courts of Quebec and Manitoba. Furthermore, the laws of Canada and those two provinces had to be enacted and published in both languages.



Since 1982, provinces, territories and municipalities have enacted numerous laws and regulations to ensure access to services in French.

### **Sociolinguistic Factors**

The development of language rights in Canada has been, and still is, largely driven by the sociolinguistic factors that characterize Canadian society.

### **Canadian Francophonie**

At the time of the 2016 Census of Canada, there were 947,040 people with French as their mother tongue living in Francophone and Acadian communities across nine provinces and three territories in Canada (excluding Quebec). Furthermore, 10.3 million Canadians said that they could carry on a conversation in French.

The day-to-day reality of Francophones living in certain regions of New Brunswick or Ontario, where there are many French-language institutions, is not the same as that of Francophones in the Far North or the West, where schools and cultural centres are often the only institutions creating a Francophone environment.

The main sociolinguistic factors that influence the development of language rights in Canada are exogamy, the standing of French internationally, debates about equality and equity, internal migration and assimilation. In this respect, assimilation does not have an impact solely on children and young people, but also on Francophone adults who work primarily in English. This observation underscores the importance of raising awareness of language rights, requesting services in French and thus contributing to a more French-speaking environment.

It is relevant in this connection to take a look at the situation of the English-speaking minority in Quebec. With respect to services in their language, English-speaking Quebecers sometimes face challenges similar to those of Francophones who live in minority settings. The difference is that their language is not threatened. They are not exposed to a risk of assimilation the way many minority French-speaking communities in Canada are.

### **Multiculturalism**

In Canada we have a complex linguistic ecosystem based on the recognition of two official languages in an increasingly multicultural context.

Young people from ethnocultural communities whose mother tongue is neither French nor English do not always seem to understand the importance given to the protection of French. At the same time, it is acknowledged that the survival of multiculturalism depends on the survival of bilingualism. In a way, French language and culture act as a bastion against the invasion of English language and culture.

In short, multiculturalism is a sociolinguistic phenomenon that also plays a role in the development of language rights in Canada.

## Examples of General and Specific Learning Outcomes

<b>1. History of Language Rights</b>	
<p><b>1.1 Development of Language Rights</b></p> <p>General learning outcome</p> <ul style="list-style-type: none"> <li>Students will be able to describe the key points in the development of language rights in Canada.</li> </ul>	<p><b>1.1.1 Period from 1867 to 1982</b></p> <p>Specific learning outcomes</p> <p>1.1.1 a) Students will be able to explain the foundations of language rights.</p> <p>1.1.1 b) Students will be able to explain why there are two official languages in Canada.</p>
	<p><b>1.1.2 Period from 1982 to the Present</b></p> <p>Specific learning outcomes</p> <p>1.1.2 a) Students will be able to explain why 1982 is a landmark date in the development of language rights.</p> <p>1.1.2 b) Students will be able to analyze the importance of the <i>Canadian Charter of Rights and Freedoms</i> in the development of language rights.</p>
<p><b>1.2 Sociolinguistic Factors</b></p> <p>General learning outcome</p> <ul style="list-style-type: none"> <li>Students will be able to make connections between sociolinguistic factors and the historical development of language rights.</li> </ul>	<p><b>1.2.1 Canadian Francophonie</b></p> <p>Specific learning outcomes</p> <p>1.2.1 a) Students will be able to describe the Canadian Francophonie, its chief characteristics, its diversity and its main demographic challenges.</p> <p>1.2.1 b) Students will understand the connection between the vitality of the French language and language rights.</p> <p>1.2.1 c) Students will be able to explain the difference between the challenges faced by the English-speaking minority in Quebec and the French-speaking minorities in Canada outside of Quebec.</p>
	<p><b>1.2.2 Multiculturalism</b></p> <p>Specific learning outcomes</p> <p>1.2.2 a) Students will be able to define and describe the state of multiculturalism in Canada.</p> <p>1.2.2 b) Students will be able to analyze the main issues of multiculturalism and language rights in Canada.</p>

A general law course could cover the period from 1982 to the present day. However, because of the lack of time allocated to the study of language rights in a general social studies course, we suggest that teachers do not spend too much time on this topic.



## **Canadian Charter of Rights and Freedoms**

The *Canadian Charter of Rights and Freedoms* is part of the Constitution of Canada. It sets down the rights and freedoms that Canadians believe are essential to the maintenance of a free, democratic society.

Among these rights and freedoms are freedom of expression, the right to equality between men and women, the rights of Indigenous peoples, the right to use either of Canada's two official languages, and the right of French-speaking and English-speaking minority communities to education in their own language.

### **Bilingualism: Federal and New Brunswick Institutions (ss. 16 to 20)**

The *Charter* contains provisions on bilingualism in federal institutions, as well as relatively similar ones on bilingualism in New Brunswick institutions.

#### **Governments of Canada and New Brunswick**

Canadians may use French or English to communicate with the head or central office of federal institutions or to obtain services from them. They may also use French or English to communicate with the regional offices of these institutions or receive services from them where there is significant demand in the language in question or where the nature of the office requires it. In New Brunswick, in contrast, residents may use French or English to communicate with any office of the provincial government.

The members of the Parliament of Canada, like those of the New Brunswick legislature, have the right to use either official language in parliamentary business. For parliamentary debates, simultaneous interpretation is provided for members sitting in the Parliament of Canada and the Legislative Assembly of New Brunswick.<sup>7</sup> This service is also provided for the work of parliamentary committees.

#### **Justice System**

Under the *Canadian Charter of Rights and Freedoms*, Canadians may use French or English in courts established by the Parliament of Canada. They may also use either official language in courts established by the Government of New Brunswick.

Federal and New Brunswick legislation on official languages provides that all Canadians may express themselves in the official language of their choice and be heard and understood by judges appointed by the governments of Canada and New Brunswick without need for translation or interpretation. Even if it is not set down in any law, bilingualism is a selection criterion for judges, including for the Supreme Court of Canada.

### **Right to Instruction in Minority Language (s. 23)**

Section 23 of the *Canadian Charter of Rights and Freedoms* is extremely important for the vitality and development of minority language communities. In recent years, several cases concerning this section of the *Charter* have gone to court. They originated in different communities across Canada and not from a single region or a single group, which is indicative of the national scope of this broad issue.

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<sup>7</sup> The right to interpretation services does not stem from the *Charter*, but rather from official languages legislation.



## Access to French-Language Schools

Under section 23 of the *Canadian Charter of Rights and Freedoms*, Canadians may have their children educated in the language of the French-speaking or English-speaking minority of the province or territory in which they reside, under these conditions:

1. It is the first official language they learned in childhood and that they still understand;
2. They themselves received primary school instruction in French or English in Canada and in the minority language of the province where they reside;
3. They already have a child who has attended or is attending school in that language in Canada.

This section of the *Charter* entitles minority language communities across the country to receive primary and secondary school instruction in their language, but only “where numbers warrant,” a specification that has had to be interpreted by the courts.

Rights holders pursuant to the criteria set down in section 23 are Canadians who have access to French-language schools in provinces and territories outside Quebec, and those who have access to English-language schools in Quebec. Children of Francophone rights holders may lose this constitutional right of access to French-language schools if they go to an English or immersion school.

## Corrective Principle

In *Doucet-Boudreau* in Nova Scotia in 2003, the Supreme Court of Canada ruled that section 23 of the *Charter* “is designed to correct past injustices not only by halting the progressive erosion of minority official language cultures across Canada, but also by actively promoting their flourishing.”<sup>8</sup>

In some communities, the lack of French-language schools meant that one or more generations were not educated in their official mother tongue, so that a strict interpretation of section 23 could prevent parents with Francophone roots from enrolling their children in French-language schools because they no longer met any of the established criteria.

The purpose of the acquired-rights clause, commonly called “grandfather” clause, that can be found in various provincial laws on education is to correct past mistakes by granting access to French language schools to children having at least one grandparent who meets the criteria of section 23, even if the parents themselves are not rights holders. The provinces and territories decide whether or not to entrust minority language school boards with responsibility for applying the clause.

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8 M. Bastarache and M. Doucet, eds., *Les droits linguistiques au Canada*, 3<sup>rd</sup> ed., Observatoire international des droits linguistiques, Faculty of Law, Université de Moncton (Cowansville, Quebec: Éditions Yvon Blais, 2014), p. 78.

## Examples of General and Specific Learning Outcomes

<b>2. Canadian Charter of Rights and Freedoms</b>	
<p><b>2.1 Bilingualism: Federal and New Brunswick Institutions (ss. 16 to 20)</b></p> <p>General learning outcome</p> <ul style="list-style-type: none"> <li>• Students will be able to discuss bilingualism in federal and New Brunswick institutions.</li> </ul>	<p><b>2.1.1 Governments of Canada and New Brunswick</b></p> <p>Specific learning outcomes</p> <p>2.1.1 a) Students will be able to describe the status of French and English in federal and New Brunswick institutions.</p> <p>2.1.1 b) Students will be able to discuss the application of the rules governing official languages to parliamentary debates and related procedures.</p> <hr/> <p><b>2.1.2 Justice System</b></p> <p>Specific learning outcomes</p> <p>2.1.2 a) Students will be able to describe the status of French and English in the functioning of the courts.</p> <p>2.1.2 b) Students will be able to discuss the question of the bilingualism of judges and the right to a trial in French.</p>
<p><b>2.2 Right to Instruction in Minority Language (s. 23)</b></p> <p>General learning outcome</p> <ul style="list-style-type: none"> <li>• Students will be able to analyze the importance of section 23 for minority language communities.</li> </ul>	<p><b>2.2.1 Access to French-Language Schools</b></p> <p>Specific learning outcomes</p> <p>2.2.1 a) Students will be able to explain the scope of section 23 with respect to access to minority language schools and school governance.</p> <p>2.2.1 b) Students will know in what cases parents may enroll their children in a French-language school.</p> <p>2.2.1 c) Students will understand the expression “rights holder.”</p> <p>2.2.1 d) Students will understand that section 23 of the <i>Charter</i> entitles Francophone minority communities across the country to benefit from primary and secondary instruction in French.</p> <p>2.2.1 e) Students will be able to explain the meaning and interpretive nature of the “where numbers warrant” principle.</p> <hr/> <p><b>2.2.2 Corrective Principle</b></p> <p>Specific learning outcomes</p> <p>2.2.2 a) Students will understand the importance of the “corrective” principle in seeking to correct past injustices with respect to access to education.</p> <p>2.2.2 b) Students will be able to explain the meaning of the acquired-rights clause and its impact on French-language schools.</p>

A general law course could cover sections 16 to 23 of the *Canadian Charter of Rights and Freedoms*. A general social studies course could be limited to the issue of access to instruction in the minority language provided in section 23.



## Services in French

An increasing number of laws on the provision of services in French have been enacted over the years. However, laws themselves are not enough; they must be accompanied by an active offer if French speakers are truly to benefit optimally from the services available.

### Legislative and Regulatory Framework

The Parliament of Canada, provincial and territorial legislative assemblies and certain municipalities have adopted provisions promoting the offer of services in French.

#### Federal, Provincial/Territorial and Municipal Public Sectors

The *Official Languages Act* now in force in Canada was enacted in 1988. It replaced the 1969 act, which was considered to be outdated, chiefly in view of sections 16 to 20 of the *Canadian Charter of Rights and Freedoms*. New Brunswick's *Official Languages Act* was enacted in 2002. It replaced the 1969 act, which had also become outdated in light of the *Canadian Charter of Rights and Freedoms*.

As for the other provinces and territories, the *French Language Services Act* was enacted in Ontario in 1986. It led to the establishment of the Office of Francophone Affairs and deals with the designation of private agencies to provide services in French. It is particularly innovative and serves in a way as a model.

In 1988, the following pieces of legislation were enacted: the *Languages Act* in Yukon, the *Act Respecting the Use of the English and French Languages* in Saskatchewan, the *Languages Act* in Alberta and the *Official Languages Act* in the Northwest Territories.


In addition, the federal government enacted the *Official Languages (Communications with and Services to the Public) Regulations* in the early 1990s; Yukon implemented its French Language Policy in 1994; and Manitoba overhauled its French Language Services Policy in 1999.

In the 2000s, the City of Ottawa adopted its municipal Bilingualism By-law, and Yukon amended its *Hospital Act* to guarantee patients the right to services in the official language of their choice. Prince Edward Island passed its new *French Language Services Act* in 2013; Newfoundland and Labrador adopted its French Language Services Policy in 2015; and Manitoba passed a number of pieces of legislation on French services between 2013 and 2016, including in the area of health and social services. Alberta also adopted a policy on French language services in 2017.

#### Private Sector

The private sector does not have to comply with the same language requirements as the public sector. However, some companies, such as Air Canada, are subject to Canada's *Official Languages Act*. Despite being privatized in 1989, the airline still has to provide services in both official languages. In addition, third parties that act on behalf of the federal or New Brunswick governments are also subject to official languages legislation.





Without being legally bound to comply, some companies offer services in both official languages in order to increase their market share and meet the needs of their customers. Banking and retailing are two sectors that seek to provide services in both French and English, at least in areas where the number of French-speaking or English-speaking customers warrants. To come back to legal obligations, under *Bill 101*, companies operating in Quebec are legally required to display signs in French. Some municipalities in New Brunswick and Ontario have also adopted by-laws making it compulsory to use both French and English on outdoor commercial signs.

### Active Offer

The active offer of services in both official languages is an obligation.

### Government Responsibility

Responsibility for actively offering services in French lies with the service providers, in this case the government departments and agencies subject to the legislative or regulatory obligation to provide services in both official languages. At present, the active offer obligation is only included in Canada's *Official Languages Act* and in New Brunswick's.

What this means is that government departments and agencies must inform the public that services are available in both official languages by means such as a bilingual greeting (Hello/Bonjour), displaying bilingual signs or allowing users to choose either French or English on the website's home page.<sup>9</sup>

The active offer of services in French is essential to ensure that Francophones can live their lives day to day in French. If there is no explicit reminder of Francophones' right to benefit from an active offer of services in French, it is highly likely that the offer will remain limited. The lack of an active offer has an adverse effect on Francophones, especially vulnerable individuals, and particularly in health care and social services.

In short, the active offer encourages people to ask for a service to be provided in the language of their choice. The active offer reduces the chances that people will in any way feel compelled to use the language of the majority.

### Demand for Services

We should reiterate that the active offer is the responsibility of service providers. Nevertheless, it is in the interests of people living in a minority community—even if the active offer principle is recognized in law—to ask to be served in the language of their choice in order to underscore the importance of the principle to public sector policy makers, and to encourage them to expand the offering.

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<sup>9</sup> Bastarache and Doucet, p. 508.

## Examples of General and Specific Learning Outcomes

<b>3. Services in French</b>	
<b>3.1 Legislative and Regulatory Framework</b>	<b>3.1.1 Federal, Provincial/Territorial and Municipal Public Sectors</b>
General learning outcome	Specific learning outcomes
<ul style="list-style-type: none"> <li>Students will be able to identify the areas in which there is an obligation to provide services in French.</li> </ul>	3.1.1 a) Students will be able to describe their language rights and the services offered in French in their community and their province or territory. 3.1.1 b) Students will understand that language rights and services provided in French are not necessarily the same from one province or territory to another.
	<b>3.1.2 Private Sector</b>
	Specific learning outcomes
	3.1.2 a) Students will understand that with respect to official languages, the private sector is not subject to the same legislative and regulatory obligations as government departments and agencies. 3.1.2 b) Students will be able to explain the reasons why some companies nevertheless offer services in both official languages.
<b>3.2 Active Offer</b>	<b>3.2.1 Government Responsibility</b>
General learning outcome	Specific learning outcome
<ul style="list-style-type: none"> <li>Students will be able to explain the principle of active offer and its importance.</li> </ul>	3.2.1 a) Students will be able to explain the responsibility of government to ensure an active offer.
	<b>3.2.2 Demand for Services</b>
	Specific learning outcome
	3.2.2 a) Students will understand the importance of asking to be served in French, even if the active offer principle is recognized in law.

A general law course could cover the legislative and regulatory framework for services provided in French in the province or territory where the course is given. A general social studies course could be limited to a few references to services in French.



## Citizen Engagement

It is essential to be able to count on citizen engagement to advance the cause of language rights. Cases that are taken to court, efforts to promote rights and work to raise political awareness are all part of civic action.

### Judicial Remedies

In addition to taking cases to court, citizens can file complaints with the various commissioners of official languages.

### Courts

Many cases have been heard by the courts on the official languages question, especially since the enactment of the *Canadian Charter of Rights and Freedoms*. These cases are taken to court by communities, community organizations, citizens or even parents who want to have their rights to services in French respected (or to services in English for the minority English community in Quebec). These cases have helped to advance language rights and to expand the scope of their application.

Legal proceedings are generally long, especially when they go all the way to the Supreme Court of Canada, which has happened numerous times. Plaintiffs have benefited from the federal government's Language Rights Support Program (LRSP), to which the Court Challenges Program (CCP) was later added, as they persevere in their cases, which can sometimes drag on for many years. (See the list of cases in the jurisprudence section, p. 20.)

### Commissioners of Official Languages

Canada's *Official Languages Act*, enacted in 1969, provided for the establishment of an office of the commissioner of official languages, with the commissioner having a mandate to take all measures within his or her power to ensure that the three main objectives of the *Act* are met:

- Ensure the equality of English and French in Parliament, the federal administration and the institutions subject to the *Act*
- Support the preservation and development of official language minority communities in Canada
- Promote the equality of English and French in Canadian society

Canada's *Official Languages Act* applies to federal institutions, such as federal government offices, Crown corporations and federal government departments. It does not apply to provincial or territorial institutions, municipalities or the private sector.

Anyone who cannot obtain a service to which he or she is entitled in either official language may file a complaint with the Office of the Commissioner of Official Languages using the online complaint form. Complaints may also be submitted by phone or by regular mail.

New Brunswick, Ontario, Nunavut and the Northwest Territories have also established commissioners' offices to monitor compliance with their official languages and French-language services legislation.



## Promotion and Political Action

In addition to judicial remedies, Canadians who wish to advance language rights in their country can promote their rights and work to raise public awareness of them.

### Public Awareness

Efforts to promote language rights and raise public awareness of them are made to encourage Francophones in minority settings to ask for services in French. The Fédération des communautés francophones et acadienne du Canada (FCFA) and its member organizations that represent the provinces and territories conduct public awareness campaigns and other initiatives.

For cultural and linguistic reasons, such as a sense of linguistic insecurity, Francophones sometimes hesitate to ask for services in French.

### Making Demands and Negotiating

Demands and negotiations are two other recommended means of advancing language rights. In a free and democratic society, interest groups can express their views to political officials, whether at the federal, provincial or territorial level, or even the municipal level.

Sometimes, taking a political approach by negotiating with governments can lead to significant gains in French services. The educational sector is a good example. Building schools requires considerable investment. Negotiations between a community and the provincial or territorial Department of Education can lead to solutions that benefit both parties, by modifying the nature of the services or facilities contemplated, or the timetable for providing them.

Going to court in an effort to force a government to comply with the rules is not without risk. In a common law system, a bad ruling may have an impact on the outcome of subsequent similar cases. Minority language communities therefore have every interest in opting first for political, conciliatory initiatives.

***For cultural and linguistic reasons, such as a sense of linguistic insecurity, Francophones sometimes hesitate to ask for services in French.***

## Examples of General and Specific Learning Outcomes

<b>4. Citizen Engagement</b>	
<p><b>4.1 Judicial Remedies</b></p> <p>General learning outcome</p> <ul style="list-style-type: none"> <li>Students will be able to describe the main means available to Canadians who wish to exercise their language rights.</li> </ul>	<p><b>4.1.1 Courts</b></p> <p>Specific learning outcomes</p> <p>4.1.1 a) Students will understand that legal proceedings initiated by community stakeholders can advance language rights.</p> <p>4.1.1 b) Students will be able to analyze the impact of a court case on language rights.</p> <hr/> <p><b>4.1.2 Commissioners of Official Languages</b></p> <p>Specific learning outcomes</p> <p>4.1.2 a) Students will be able to explain the role of commissioners of official languages.</p> <p>4.1.2 b) Students will be familiar with the complaints procedure of the Commissioner of Official Languages of Canada, their province or their territory.</p>
<p><b>4.2 Promotion and Political Action</b></p> <p>General learning outcome</p> <ul style="list-style-type: none"> <li>Students will be able to explain the importance of promoting language rights and taking political action to advance language rights in Canada.</li> </ul>	<p><b>4.2.1 Raising Awareness</b></p> <p>Specific learning outcomes</p> <p>4.2.1 a) Students will understand the importance of promoting language rights so that people feel free to ask to be served in French.</p> <p>4.2.1 b) Students will be able to analyze cultural and linguistic factors that may encourage Francophones to ask for services in French, or discourage them from doing so.</p> <hr/> <p><b>4.2.2 Making Demands and Negotiating</b></p> <p>Specific learning outcomes</p> <p>4.2.2 a) Students will be able to explain the importance of engagement, demands and negotiations in advocating for language rights.</p> <p>4.2.2 b) Students will be able to explain how people can assert their language rights in a free and democratic society.</p>

A general law course could cover judicial remedies, namely the courts and official language commissioners. A general social studies course could go into the same issues in less detail.



## LEARNING METHODS

These few methods proposed for teaching language rights are suggestions for provincial and territorial departments of education. They will need to be adapted to the reality and challenges of the specific province or territory in question, which is a task for advisory committees made up of teachers and jurists.

We feel that exercises assigned to students should reflect their reality and that of their community as closely as possible. For instance, it would be better to base coursework on local and regional current affairs related to language rights, as the topic is presented by the media. Here are some issues that students could explore as part of their learning activities: the redrawing of the electoral map and its impact on services in French; the elimination of a bus service devoted to Francophone students; the addition of a facility or classrooms to a minority language school; municipal services offered in French; or the gaps in bilingual provincial or territorial services in spite of enacted legislation. All these issues have an impact on the development of language rights. They therefore need to be followed closely. Teaching activities could include having students ask to be served in French in public institutions and businesses. Students could then discuss their experiences in class. It would also be a good idea to have them do exercises that help them understand the differences in what services are provided in French from one region of the country to another.

Studying a case concerning access to education in the minority language or to services in French from the RCMP could serve as a common thread of a course on language rights, a general law course or a social studies course that includes a language rights component.

Ideally, students would benefit from hearing lawyers, jurists or regular citizens who have gone to court over language rights talk about their experiences. Technology could facilitate these discussions.

***We feel that exercises assigned to students should reflect their reality and that of their community as closely as possible.***

## TEACHING RESOURCES

In this section we suggest some websites that offer very useful teaching tools and legal documents pertaining to the main topics we have referred to:

Association canadienne d'éducation de langue française (ACELF), [www.acelf.ca](http://www.acelf.ca)

Canadian Legal Information Institute (CANLII), [www.canlii.org/en/index.html](http://www.canlii.org/en/index.html)

CliquezJustice.ca, [www.cliquezjustice.ca/ressources-pedagogiques](http://www.cliquezjustice.ca/ressources-pedagogiques)

Court Challenges Program (CCP), [www.ccppcj.ca](http://www.ccppcj.ca)

Fédération des associations de juristes d'expression française de common law inc. (FAJEF), [www.fajef.ca](http://www.fajef.ca)

International Observatory on Language Rights, [www.droitslinguistiques.ca/en/home](http://www.droitslinguistiques.ca/en/home)

LEXUM, [https://scc-csc.lexum.com/scc-csc/scc-csc/en/nav\\_date.do](https://scc-csc.lexum.com/scc-csc/scc-csc/en/nav_date.do)

National portal of resources and terminology for legal professionals, [www.jurisource.ca/en](http://www.jurisource.ca/en)

Parliament of Canada, [www.lop.parl.gc.ca/about/parliament/Education/classroom-activities-e.html](http://www.lop.parl.gc.ca/about/parliament/Education/classroom-activities-e.html)

Site for Language Management in Canada (SLMC), <https://slmc.uottawa.ca>

*We feel it would be worthwhile to set up a website to provide support for teachers. The site would make existing teaching resources available, including general information about language rights, learning activities and useful Internet links. New teaching resources should also be created in order to bring current tools up to date.*

## JURISPRUDENCE

We wish to stress how important it is to adapt teaching methods to the reality of each province or territory. This is the standpoint we have taken in listing precedent-setting language rights cases by province and territory. We have also grouped them by topic: education, services and language status. Note that the list is not exhaustive.

### Provinces and Territories

#### Alberta

- *Mahe v. Alberta*, [1990] 1 S.C.R. 342
- *Caron v. Alberta*, [2015] 3 S.C.R. 511

#### British Columbia

- *R. v. Beaulac*, [1999] 1 S.C.R. 768
- *Conseil scolaire francophone de la Colombie-Britannique v. British Columbia*, [2013] 2 S.C.R. 774
- *Association des parents de l'école Rose-des-vents v. British Columbia (Education)*, [2015] 2 S.C.R. 139

#### Manitoba

- *Attorney General of Manitoba v. Forest*, [1979] 2 S.C.R. 1032
- *Re Manitoba Language Rights*, [1985] 1 S.C.R. 721

#### New Brunswick

- *Société des Acadiens v. Association of Parents*, [1986] 1 S.C.R. 549
- *Charlebois v. Saint John (City)*, [2005] S.C.C. 74
- *Société des Acadiens et Acadiennes du Nouveau-Brunswick Inc. v. Canada*, [2008] S.C.C. 15
- *R. v. Losier*, [2011] N.B.C.A. 102

#### Newfoundland and Labrador

- *Chubbs et al. v. Newfoundland and Labrador*, [2004] N.L.S.C.T.D. 89

#### Northwest Territories

- *Fédération franco-ténoise v. Attorney General of Canada*, [2006] N.W.T.S.C. 20
- *Commission scolaire francophone, Territoires du Nord-Ouest et al. v. Attorney General of the Northwest Territories*, [2012] CanLII 31411
- *Association des parents ayants droit de Yellowknife et al. v. Attorney General of the Northwest Territories et al.*, [2015] CanLII 170 (N.W.T.C.A.)

#### Nova Scotia

- *Lavoie v. Nova Scotia (Attorney General)*, [1988] 84 N.S.R. (2d) 387
- *Doucet-Boudreau v. Nova Scotia (Minister of Education)*, [2003] S.C.C. 62
- *Reference re the Final Report of the Electoral Boundaries Commission*, [2017] N.S.C.A. 10



## Nunavut

- No cases

## Ontario

- *Reference re Bill 30, An Act to Amend the Education Act (Ont.)*, [1987] 1 S.C.R. 1148
- *Lalonde v. Ontario (Commission de restructuration des services de santé)*, [2001], 56 O.R. (3d) 505
- *DesRochers v. Canada (Industry)*, [2009] S.C.C. 8

## Prince Edward Island

- *Arsenault-Cameron v. Prince Edward Island*, [2000] S.C.C. 1

## Quebec

- *Solski (Tutor of) v. Quebec (Attorney General)*, [2005] 1 S.C.R. 201
- *MacDonald v. City of Montreal*, [1986] 1 S.C.R. 460
- *Att. Gen. of Quebec v. Blaikie et al.*, [1979] 2 S.C.R. 1016

## Saskatchewan

- *Conseil scolaire fransaskois de Zenon Park v. Saskatchewan*, [1998] 172 Sask R 257
- *Mercure v. A. G. for Saskatchewan*, [1988] 1 S.C.R. 234

## Yukon

- *R. v. St Jean*, [1987] N.W.T.R. 118
- *Yukon Francophone School Board, Education Area #23 v. Yukon (Attorney General)*, [2015] S.C.C. 25

## Education

- *Société des Acadiens v. Association of Parents*, [1986] 1 S.C.R. 549
- *Reference re Bill 30, An Act to Amend the Education Act (Ont.)*, [1987] 1 S.C.R. 1148
- *Conseil scolaire fransaskois de Zenon Park v. Saskatchewan*, [1998] 172 Sask R 257
- *Lavoie v. Nova Scotia (Attorney General)*, [1988] 84 N.S.R. (2d) 387
- *Mahe v. Alberta*, [1990] 1 S.C.R. 342
- *Arsenault-Cameron v. Prince Edward Island*, [2000] S.C.C. 1
- *Doucet-Boudreau v. Nova Scotia (Minister of Education)*, [2003] S.C.C. 62
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- *Association des parents ayants droit de Yellowknife et al. v. Attorney General of the Northwest Territories et al.*, [2015] CanLII 170 (N.W.T.C.A.)



## Services

- *MacDonald v. City of Montreal*, [1986] 1 S.C.R. 460
- *R. v. Beaulac*, [1999] 1 S.C.R. 768
- *Lalonde v. Ontario (Commission de restructuration des services de santé)*, [2001], 56 O.R. (3d) 505
- *Charlebois v. Saint John (City)*, [2005] S.C.C. 74
- *Fédération franco-ténoise v. Attorney General of Canada*, [2006] N.W.T.S.C. 20
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- *R. v. Losier*, [2011] N.B.C.A. 102
- *Conseil scolaire francophone de la Colombie-Britannique v. British Columbia*, [2013] S.C.C. 42

## Language Status

- *Att. Gen. of Quebec v. Blaikie et al.*, [1979] 2 S.C.R. 1016
- *Attorney General of Manitoba v. Forest*, [1979] 2 S.C.R. 1032
- *Re Manitoba Language Rights*, [1985] 1 S.C.R. 721
- *R. v. St Jean*, [1987] N.W.T.R. 118
- *Caron v. Alberta*, [2015] 3 S.C.R. 511
- *Mercure v. A. G. for Saskatchewan*, [1988] 1 S.C.R. 234
- *Reference re the Final Report of the Electoral Boundaries Commission*, [2017] N.S.C.A. 10

## OTHER RECOMMENDATIONS

The working group that examined the teaching of language rights in French-language schools in minority settings also drew up some other recommendations for the Departments of Education of Canada's provinces and territories. Their main suggestions were as follows:

- Raise education faculties' awareness of the importance of incorporating the subject of language rights into their curricula and encourage them to make a commitment in this regard;
- Work with the Réseau national de formation en justice to develop tools and raise awareness of the importance of language rights;<sup>10</sup>
- Incorporate the teaching of language rights into a law or social studies course. This could be done by taking an historical approach, in order to give students an understanding of how those rights have evolved, or a contemporary approach that includes a look back at the main historical events that have shaped language rights in Canada;
- Include in curricula a glossary of legal terms and a synopsis of key cases brought before the courts by Canadian communities to secure recognition of language rights. This would support both teaching and learning;
- Monitor language rights court cases and current affairs by organizing a strategic watch of legal developments;
- Apply the concept of *conscientisation* developed in the Pédagogie à l'école de langue française (PELF) (a pedagogy for French-language schools) in order to encourage an engaged citizenship;<sup>11</sup>
- Tailor language rights curricula to students' cultural environment. A culture-based approach to instruction should be reflected in teaching activities;
- Last, develop students' ability to think critically so that they can express themselves and take an active approach to the issue of language rights in their communities. It is important for students to be able not only to exercise their rights, but also to further the development of those rights while respecting the vision of the English and French founding peoples.

<sup>10</sup> [www.acufc.ca/l-acufc-et-la-justice/le-reseau-national-de-formation-en-justice](http://www.acufc.ca/l-acufc-et-la-justice/le-reseau-national-de-formation-en-justice).

<sup>11</sup> The term *conscientisation* comes, of course, from a combination of the words "conscientisation" (awareness-raising) and "action." In the PELF, conscientisation is defined as follows: Students and teachers develop awareness of Francophone issues, and take action to address their situation.



## CONCLUSION

Learning about language rights is a community endeavour. Students need to be made aware of the importance of language rights and assimilate the concepts associated with those rights. To be able to help them, teachers must be given the proper tools, but also be involved in developing the teaching programs. School counsellors, Department of Education officials and parents also need to be informed about language rights and their importance, and English-speaking stakeholders and immersion school staff should also be made aware of them.

It is our belief that implementing a program on language rights or developing content on this topic to be incorporated into existing law or social studies courses would better prepare students to contribute to the development of their communities.

We would like to stress that incorporating material about language rights into compulsory social studies courses would ensure that all students who attend French-language schools in minority settings would have a basic knowledge of their language rights by the time they finish high school.

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