



# Investigation Report

**FILE NO.** 2017-3305

**INSTITUTION IN QUESTION** Department of  
Social Development

**SUBJECT** Alleged deficiencies in the provision  
of services in French

**REPORT DISTRIBUTED TO THE  
FOLLOWING PERSONS** Premier  
Deputy Minister of Social  
Development  
Clerk of the Executive Council  
Office  
Complainant

January 2018



# Summary

This investigative report was prepared in response to a complaint about the Department of Social Development. The complainant, an employee of a private home care agency, alleged that she was unable to use French during an investigation into an incident that allegedly occurred in connection with her work with a client of the Department.

The Department justified the use of English, saying that English was the language of choice of the Department's client and that the complainant had used this language when providing services for the client. Also, according to the institution, the complainant did not request service in French during the first communication with Department staff.

In view of the information gathered during the course of the investigation, the Office of the Commissioner concluded that the complaint was founded and that the complainant's language rights had not been respected. This conclusion was based primarily on the fact that the interactions of the complainant, an employee of a private agency, with the Department during the investigation were equivalent to interactions that members of the public might have with any department and were therefore to be treated as such. As a result, the complainant was entitled to use the official language of her choice during the investigation. The institution did not make an active offer to the complainant and chose to communicate with her in English without ever determining her language of choice.

Upon the conclusion of this investigation, the Office of the Commissioner makes the following recommendations:

- THAT** by March 31, 2018, the institution review the training given to its employees with respect to active offer and the provision of services in the official language of choice to ensure that this training covers the linguistic obligations of the institution when it has dealings with employees of third parties during investigations;
- THAT** by March 31, 2018, the institution remind all of its employees about the institution's linguistic obligations when it has dealings with employees of third parties during an investigation;
- THAT** by March 31, 2018, the institution review the linguistic profile of the Long Term Care Unit, Disability Support Program, and Adult Protection of the regional office in Fredericton to ensure that this profile guarantees the provision of services of equal quality in both official languages;
- THAT** by June 30, 2018, the institution report to the Office of the Commissioner on the implementation of the recommendations set out in this investigation report.

# The Complaint

On March 20, 2017, the complainant, who works for a home support agency, reported having received a call from a social worker<sup>1</sup> at the Department of Social Development<sup>2</sup>. The purpose of the call was to ask her to attend a meeting about an alleged incident that had occurred in connection with her work with a client of the Department.

The social worker allegedly spoke English only, without even making an active offer of service at the start of the conversation. During the conversation, the complainant felt intimidated and was allegedly told by the social worker, in English only, that a meeting was to take place between the institution and the complainant the following day, March 21, 2017.

On March 21, the complainant went to the meeting. In addition to the social worker, another employee of the institution<sup>3</sup>, also a social worker, was also present.

Once again, the complainant said she had not received an active offer of service or been provided with service in French. She said she felt intimidated by the initial comments made by the first social worker and did not dare to request service in her language of choice.

The complainant alleged that the first social worker had said that, if the complainant wanted to receive service in French, that would complicate things and result in delays in the handling of the matter. The complainant, distressed by the allegations being made about her and unaware of her language rights, answered a number of questions in English. The complainant said that she had been very confused by some of the questions, which were asked several times and in various ways. The complainant was afraid of not expressing herself clearly under the circumstances because English was not her official language of choice.

The complainant said she had been on leave from work since the incident in question.

On March 27, 2017, the complainant contacted the institution to find out the status of her situation. A supervisor<sup>4</sup> with the institution informed the complainant, in English only, that the process was following its course and would take however long was necessary.

The complainant felt that the institution had not respected her language rights when it required that she proceed in English and give her version of the facts about an incident in a language that was not her official language of choice. The seriousness of the alleged matter heightened the complainant's feelings of distress.

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<sup>1</sup> The names of the employees of the Department of Social Development were disclosed to the institution in the notice of investigation to support the institution in its handling of its internal investigation. However, these names do not appear in the investigation report as it could be made public.

<sup>2</sup> Long Term Care Unit, Disability Support Program, and Adult Protection.

<sup>3</sup> The names of the employees of the Department of Social Development were disclosed to the institution in the notice of investigation to support the institution in its handling of its internal investigation. However these names do not appear in the investigation report as it could be made public.

<sup>4</sup> *Ibid.*

# The Investigation

On April 26, 2017, pursuant to subsection 43(13) of the *Official Languages Act* (OLA), a notice of investigation was sent to the Deputy Minister of the institution named in the complaint, i.e., the Department of Social Development, to serve notice of the intention of the Office of the Commissioner to conduct an investigation into this matter. In that letter, the Office of the Commissioner asked the institution to respond to the allegations made by the complainant. It also asked the institution the following questions:

1. What was the bilingual capacity\* of the social workers in the Long Term Care Unit, the Disability Support Program, and Adult Protection in Fredericton on March 1, 2017?

Bilingual capacity = number of bilingual social workers in the Long Term Care Unit, the Disability Support Program, and Adult Protection, in Fredericton

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Number of social workers in the Long Term Care Unit, the Disability Support Program, and Adult Protection, in Fredericton

2. What level of second-language oral proficiency is required<sup>5</sup> by your institution for social workers in the Long Term Care Unit, the Disability Support Program, and Adult Protection in Fredericton?
3. What procedure was used to evaluate and conclude that this level of proficiency was sufficient for these social workers to be able to offer service to members of the public that meets the obligations set out in the OLA?
4. According to the Unit's operations data, can the institution confirm that the number of bilingual social workers identified in question 1 is sufficient to offer quality services in both official languages to members of the public at all times, in accordance with the obligations set out in the OLA?
5. In view of the complainant's allegations, how does the institution explain the failure of the social worker who initially contacted the complainant and the supervisor to make an active offer of service?
6. In view of the complainant's allegations, how does the institution explain the fact that the employee told the complainant that, if she chose to proceed in French, that would complicate matters and lead to undue delays?

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<sup>5</sup> **Appendix "A"** – Oral Proficiency Rating Scale developed by the Department of Post-Secondary Education, Training and Labour.

**7.** What procedure does the institution use periodically to ensure that social workers meet their obligations under section 28.1 of the OLA, which requires that the institution ensures that measures are taken to make it known to members of the public that its services are available in the official language of their choice? Please forward a copy of any such policy.

**8.** The complainant said that she did not receive service in the language of her choice – French – from the three different employees with whom she was in communication by telephone and in person.

How does the institution ensure that social workers in the Long Term Care Unit, the Disability Support Program, and Adult Protection are truly able to provide full, ongoing, quality service in French that is equivalent to the service available in English?

**9.** Does the institution conduct audits or assessments to ensure that social workers in its various divisions are aware of, and are fully compliant with, their obligations under the internal official languages policy and the OLA?

i. If yes, please provide us with the frequency of these audits or assessments for 2016.

**10.** In view of the complainant's allegations, has the institution prepared an action plan for 2017 to increase its ratio of bilingual social workers in the Fredericton region?

i. If yes, please forward the details of this action plan.

## The Institution's Responses

In a letter dated July 20, 2017, the institution responded to the complainant's allegations as well as to the questions of the Office of the Commissioner. It should be noted that the institution did not directly associate its responses with the questions asked by the Office of the Commissioner. As a result, it was sometimes difficult to match up the information provided with the questions of the Office of the Commissioner.

To start with, the institution stated that it was committed to providing services in both official languages and that all employees were required to make an active offer of service and to provide service in the clients' official language of choice.

In answer to **question 1**, the institution stated that the Long Term Care Unit, the Disability Support Program, and Adult Protection had eighteen (18) social workers, two (2) of whom were bilingual and sixteen (16) of whom were Anglophone. According to the institution, this linguistic profile fully represented the demographic data concerning its clients and enabled the institution to offer services in both official languages. The institution indicated that, to date, the two bilingual social workers had been dealing mainly with Anglophone cases because the demand for service in French was not very high.

As for the level of second-language oral proficiency required by the institution (**question 2**), the institution noted that, at the time of recruitment, bilingual social workers must obtain an advanced level orally and an intermediate level in written and reading comprehension.

In response to **question 3**, the institution did not provide any clarifications about how it determines the level of second-language oral proficiency but merely stated that the Department considered that this level of proficiency met the needs of its clientele.

In response to **question 4**, the institution referred to the concept of linguistic teams (groups of unilingual and bilingual employees who provide services in both languages) as a way of ensuring that services can be offered in English and in French. If an employee is unable to provide service in the client's language of choice, that employee must have access to a team member who speaks that language.

In response to **question 5**, the institution stated first that, under the *Family Services Act*, when the Minister of Social Development has reason to believe that a person is a neglected or abused adult, he must conduct an investigation and strive to complete all adult protection investigations in a timely manner to ensure client safety. It was in connection with such an investigation that the complainant was to be interviewed. The institution justified the use of English in the interactions between the complainant and the social workers, saying basically that the complainant was providing, through a third party, a service to a client of the institution whose language of choice was English. The institution explained that it has a Language of Client File Policy. This policy stipulates as follows:

- That all documentation in a client's file is written in the client's language of choice from New Brunswick's two official languages;
- That the policy will supersede the Language of Work Policy when it comes to client files; and

- That employees of the Department have a legal obligation under the *Official Languages Act*, which is under the Language of Service Policy, to ensure that the Language of Client File Policy is adhered to.

Since English was the language of choice of the service recipient (language of file) and the complainant had provided services for this client, whose language was English, for more than an year, the institution seemed to consider it appropriate for the social workers to use this language during their investigation. The institution also noted that the complainant had not requested service in French during her interactions with the first social worker. It was not until the telephone conversation with the supervisor that the complainant allegedly requested that communications be in French. The institution indicated that the supervisor had noted this information and communicated it to the persons concerned. The institution noted as well that the complainant had completed and signed a consent form allowing her file to be verified in English.

The institution denied the allegations that a social worker had told the complainant that using French could complicate things and result in delays. The institution therefore did not provide any other explanations in response to **question 6**.

With respect to the procedure used by the institution to remind its employees to make an active offer of service (**question 7**), the institution referred to the measures in the action plan on official languages, i.e., language of service training (“module”) of the Treasury Board’s Knowledge Centre – iLearn.

**Question 8** concerned how the institution ensures that social workers are able to provide service of equal quality in both official languages. In addition to the clarifications already noted with respect to the level of second-language oral proficiency required, the institution provided details about the objectives and measures set out in the action plan on official languages.

In response to **question 9** about the measures taken by the institution to ensure that social workers are aware of and comply with the institution’s linguistic obligations, it referred again to the plan on official languages and noted that all employees must take a training module on language of service (Treasury Board’s Knowledge Centre – iLearn). In addition, the institution noted that each employee is subject to an annual performance appraisal that includes a review of government policies, including the policies on official languages.

Last of all, in **question 10**, the Office of the Commissioner asked the institution if it had prepared an action plan to increase its ratio of bilingual social workers in the Fredericton region. The institution stated that, under the action plan, it would continue to assess and implement procedures for tracking completion of the official languages training and to update employee appraisals. The Department of Social Development will report on this action plan in its annual report.

## Analysis by the Office of the Commissioner

With respect to communication with the public, the OLA states as follows:

27. Le public a le droit de communiquer avec toute institution et d'en recevoir les services dans la langue officielle de son choix.	27. Members of the public have the right to communicate with any institution and to receive its services in the official language of their choice
28. Il incombe aux institutions de veiller à ce que le public puisse communiquer avec elles et en recevoir les services dans la langue officielle de son choix.	28. An institution shall ensure that members of the public are able to communicate with and to receive its services in the official language of their choice.
28.1 Il incombe aux institutions de veiller à ce que les mesures voulues soient prises pour informer le public que leurs services lui sont offerts dans la langue officielle de son choix.	28.1 An institution shall ensure that appropriate measures are taken to make it known to members of the public that its services are available in the official language of their choice.

In a context of legislative bilingualism, it is important for those who have to interpret a legislative provision to read both versions of it to ensure that they say the same thing because it may happen that the two versions differ. In the event of a difference, the interpreter must determine which of the versions best represents the intention of the legislator. With this in mind, the Office of the Commissioner here adopts the practice of reproducing both versions of the relevant provisions of the OLA and, if it is apparent that the two versions do not say the same thing, it will offer its interpretation of what it considers to be the intention of the legislator.

According to the French version of sections 27, 28, and 28.1 of the OLA, the beneficiary of the recognized rights is the “public,” whereas, in the English version, the beneficiary is “members of the public.” The words “members of” in the English version do not appear in the French version. Also, the choice of the word “public” in the French version to designate a beneficiary of rights may seem surprising because this is not a term normally used in law. However, in the decision *Gautreau v. New Brunswick* (1989), 101 SNB (2e) 1, the Court of Queen’s Bench of New Brunswick concluded that using this term did not pose any difficulties. Whether in French or in English, the term is clear. It refers to any individual or group of persons.

The complainant is not an employee of the institution, i.e., the Department of Social Development. She is an employee of a home support agency that offers in-home support services to the elderly, to disabled persons, to new mothers, and to any other person who needs them. The agency is not part of, or an institution of, the Government of New Brunswick but was hired to provide a service for clients of the institution. When it offers services to clients of the institution at the institution’s request, this home support agency can be considered, within the meaning of section 30 of the OLA, a third party that provides services on behalf of the institution. The institution is therefore responsible for ensuring that the agency honours the obligations set out in sections 27 to 29 of the OLA.

The complaint in this case does not relate to the refusal of the third party or the complainant to offer services in the official language chosen by the client of the institution. It relates to quite another issue, namely, an investigation conducted by the institution pursuant to the authority conferred upon it by a piece of legislation. Indeed, under the *Family Services Act*, where the Minister has reason to believe that a person is a neglected adult or an abused adult, he shall cause an investigation to be made. The

Department of Social Development is responsible for conducting these investigations. During the course of such an investigation, certain people may be interviewed. This was the case with the complainant. In such a case, the person interviewed in connection with an investigation is a member of the “public” within the meaning of the OLA.

On March 20, 2017, the complainant received a call from a social worker, asking her to come to a meeting about an alleged incident that had occurred in connection with her duties. During that call, the social worker spoke only English and did not make an active offer of service. On March 21, 2017, the complainant attended a meeting at which the social worker and another employee of the institution were present. That meeting, too, took place only in English. The complainant alleged that, during that meeting, the social worker had told her that, if she wanted to receive service in French, that would complicate things and result in delays in the handling of the matter. In its detailed response, the institution refuted that allegation of the complainant.

Because the complainant was not an employee of the provincial government or one of its institutions, we cannot conclude that the investigation was related to a job within the public service. The matter was therefore not related to a relationship that could raise questions about language of work in the public service. Since the complainant was employed by a private company, her interactions with the institution during the investigation were equivalent to interactions that the public might have with an institution of the government and must be treated as such.

Under section 27 of the OLA, the complainant, as a member of the public, had the right to communicate with the institution in the official language of her choice. This right also included the right to be heard and understood in her official language of choice. The institution’s obligation to communicate with a member of the public in the official language of that person’s choice is confirmed in section 28 of the OLA. In the case at hand, the complainant had the right to communicate with the institution in the official language of her choice, and the institution had the obligation to communicate with her in that language.

The complainant’s rights were not respected by the institution. The fact that the complainant did not ask the investigator about having the investigation process take place in French is of no consequence. It is not up to members of the public to request service in the official language of their choice. Active offer of service is the first step that the institution’s representative must take, and it is up to that person to inform members of the public of their right to use the official language of their choice.

Also, the fact that the complainant, as part of her job, worked with a client in English and signed a consent form in English is of no importance. Of course, the complainant had the obligation under the OLA to offer the client services in the official language of his choice. However, this does not preclude her right to receive services from the institution in the official language of her choice when she is acting as a member of the public. Furthermore, the fact that a person does or does not understand English or French does not preclude that person’s right to choose the official language in which he or she wishes to communicate with government institutions. In this case, the institution must make an active offer of service, and it must respect the choice made by the member of the public. Once the choice of language has been made, the institution must make sure it has the necessary mechanisms to ensure that the member of the public can immediately receive quality service in the official language of his or her choice.

Section 28.1 of the OLA clearly states that an institution must ensure that appropriate measures are taken to make it known to members of the public that its services are available in the official language of their choice. Consequently, when first contact was made with the complainant, the institution’s representatives had the obligation to inform her of her right to communicate in the official language of

her choice during the investigation, and the institution had the corresponding obligation to communicate and offer services in the official language chosen. In the case at hand, the active offer obligation set out in section 28.1 was not met.

In its responses, the institution referred to its action plan on official languages and stated that the goal of the plan was to ensure that New Brunswickers have access to **equitable** quality services in English and in French across the province. The use of the term “equitable” is inappropriate in the context of official languages. This expression seems to indicate that the obligation to offer services in the official languages is one of mere accommodation. However, the obligation is rather to ensure that members of the public have immediate access to services of equal quality at all times in both official languages.

The institution further indicated that the Long Term Care Unit, the Disability Support Program, and Adult Protection in Fredericton had two (2) bilingual social workers and sixteen (16) unilingual Anglophone social workers. According to the institution, this linguistic profile fully represented the demographic data of its clients and made it possible to provide service in both official languages. Also, it stated that, to date, the two bilingual social workers had had mainly Anglophone cases because the demand for services in French was not very high.

Given the little information provided about this by the institution, it is impossible for us to conclude definitively that the bilingual capacity of the social workers as of March 1, 2017, was adequate. We have serious doubts about the method used by the institution to assess the bilingual capacity of its staff. Relying solely on demographic data does not seem to be an appropriate way to determine how many bilingual workers are required. The presence of only two (2) bilingual social workers out of eighteen (18) seems insufficient in any case. We would point out that the presence of bilingual employees does not preclude offering services in the language of the majority. Rather, it is a guarantee that both official language communities will be immediately served in the official language of their choice. Furthermore, if active offer is not a reflex among all of the employees of this unit, that might explain the low demand for service in French.

The institution indicated that, at the time of recruitment, bilingual social workers must obtain an advanced level orally and an intermediate level in reading and writing. By advanced level orally, we presume the institution is referring to level (3) on the Oral Proficiency Rating Scale used by the Government of New Brunswick. The intermediate level in written comprehension and reading must be referring to level (2) on the same scale. The institution does not indicate in its response which procedure it used to assess and conclude that these levels of proficiency were sufficient to offer service in accordance with the obligations set out in the OLA.

# Conclusion and Recommendations

According to the complainant's allegations, there was a violation of the following sections of the OLA, which stipulate as follows:

## Communication with the public

- 27** Members of the public have the right to communicate with any institution and to receive its services in the official language of their choice.
- 28** An institution shall ensure that members of the public are able to communicate with and to receive its services in the official language of their choice.
- 28.1** An institution shall ensure that appropriate measures are taken to make it known to members of the public that its services are available in the official language of their choice.

Upon completion of its investigation, the Office of the Commissioner concludes that the institution in question did not meet its obligations under the OLA because it did not, during its investigation of the complainant, make an active offer, being satisfied to communicate with her in English without ever determining her language of choice. The Office of the Commissioner also concludes that the institution in question did not respect the complainant's right to receive communications in the official language of her choice. The complaint is therefore **founded**, and there was a violation of the OLA.

To prevent a situation similar to that of the complainant from occurring again, the Office of the Commissioner makes the following recommendations:

- THAT** by March 31, 2018, the institution review the training given to its employees with respect to active offer and the provision of services in the official language of choice to ensure that this training covers the linguistic obligations of the institution when it has dealings with employees of third parties during investigations;
- THAT** by March 31, 2018, the institution remind all of its employees about the institution's linguistic obligations when it has dealings with employees of third parties during an investigation;
- THAT** by March 31, 2018, the institution review the linguistic profile of the Long Term Care Unit, Disability Support Program, and Adult Protection of the regional office in Fredericton to ensure that this profile guarantees the provision of services of equal quality in both official languages;
- THAT** by June 30, 2018, the institution report to the Office of the Commissioner on the implementation of the recommendations set out in this investigation report.

In accordance with section 43(16) of the OLA, we submit this report to the Premier, to the Deputy Minister of Social Development, to the Clerk of the Executive Council Office, and to the complainant.

Pursuant to subsection 43(18) of the OLA, if the complainant is dissatisfied with the conclusions presented following this investigation, she may apply to the Court of Queen's Bench of New Brunswick for a remedy.

Katherine d'Entremont, M.P.A.  
Commissioner of Official Languages for New Brunswick  
Dated at Fredericton,  
In the Province of New Brunswick  
January 3, 2018

## APPENDIX "A"

### Oral Proficiency Rating Scale, Department of Post-Secondary Education, Training and Labour

#### **Novice (0+) Memorized Proficiency**

Able to satisfy immediate needs using rehearsed utterances. Shows little real autonomy of expression, flexibility or spontaneity. Can ask questions or make statements with reasonable accuracy only with memorized utterances or formulae. Attempts at creating speech are usually unsuccessful.

#### **Basic (1) Elementary Proficiency**

Able to satisfy minimum courtesy requirements and maintain very simple face-to-face conversations on familiar topics. A native speaker must often use slowed speech, repetition, paraphrase or a combination of these to be understood by this individual. Similarly, the native speaker must strain and employ real-world knowledge to understand even simple statements/questions from this individual. This speaker has a functional but limited proficiency. Misunderstandings are frequent, but the individual is able to ask for help and to verify comprehension of native speech in face-to-face interaction. The individual is unable to produce continuous discourse except with rehearsed material.

#### **Basic+ (1+) Elementary Proficiency Plus**

Can initiate and maintain predictable face-to-face conversations and satisfy limited social demands. He/she may, however, have little understanding of the social conventions of conversation. The native speaker is generally required to strain and employ real-world knowledge to understand even some simple speech. The speaker at this level may hesitate and may have to change subjects due to lack of language. Speech largely consists of a series of short, discrete utterances.

#### **Intermediate (2) Limited Working Proficiency**

Able to satisfy routine social demands and limited work requirements. Can handle routine work-related interactions that are limited in scope. In more complex and sophisticated work-related tasks, language usage generally disturbs the native speaker. Can handle with confidence, but not with facility, most normal, high-frequency social conversational situations, including extensive but casual conversations about current events, as well as work, family and autobiographical information. The individual can get the gist of most everyday conversations but has some difficulty understanding native speakers in situations that require specialized or sophisticated knowledge. The individual's utterances are minimally cohesive. Linguistic structure is usually not very elaborate and not thoroughly controlled; errors are frequent. Vocabulary use is appropriate for high-frequency utterances but unusual or imprecise elsewhere.

### **Intermediate+ (2+) Limited Working Proficiency Plus**

Able to satisfy most requirements with language usage that is often, but not always, acceptable and effective. The individual shows considerable ability to communicate effectively on topics relating to particular interests and special fields of competence. Often shows a high degree of fluency and ease of speech, yet when under tension or pressure, the ability to use the language effectively may deteriorate. Comprehension of normal native speech is typically nearly complete. The individual may miss cultural and local references and may require a native speaker to adjust to his/her limitations in some ways. Native speakers often perceive the individual's speech to contain awkward or inaccurate phrasing of ideas, mistaken time, space and person references, or to be in some way inappropriate, if not strictly incorrect.

### **Advanced (3) General Professional Proficiency**

Able to speak the language with sufficient structural accuracy and vocabulary to participate effectively in most formal and informal conversations on practical, social and professional topics. Nevertheless, the individual's limitations generally restrict the professional contexts of language use to matters of shared knowledge and/or international convention. Discourse is cohesive. The individual uses the language acceptably but with some noticeable imperfections; yet, errors virtually never interfere with understanding and rarely disturb the native speaker. The individual can effectively combine structure and vocabulary to convey his/her meaning accurately. The individual speaks readily and fills pauses suitably. In face-to-face conversation with natives speaking the standard dialect at a normal rate of speech, comprehension is quite complete. Although cultural references, proverbs and the implications of nuances and idioms may not be fully understood, the individual can easily repair the conversation. Pronunciation may be obviously foreign. Individual sounds are accurate, but stress, intonation and pitch control may be faulty.

### **Advanced+ (3+) General Professional Proficiency Plus**

Able to use the language to satisfy professional needs in a wide range of sophisticated and demanding tasks.

### **Superior (4) Advanced Professional Proficiency**

Able to use the language fluently and accurately on all levels normally pertinent to professional needs. The individual's language usage and ability to function are fully successful. Organizes discourse well, using appropriate rhetorical speech devices, native cultural references, and understanding. Language ability only rarely hinders him/her in performing any task requiring language; yet, the individual would seldom be perceived as a native. Speaks effortlessly and smoothly and is able to use the language with a high degree of effectiveness, reliability and precision for all representational purposes within the range of personal and professional experience and scope or responsibilities. Can serve as an informal interpreter in a range of unpredictable circumstances. Can perform extensive, sophisticated language tasks, encompassing most matters of interest to well-educated native speakers, including tasks which do not bear directly on a professional specialty.

Source: Judith Liskin-Gasparro. Testing and Teaching for Oral Proficiency. Boston: Heinle and Heinle Publications. 1987.

**Postsecondary Education, Training and Labour**, *Oral Proficiency Rating Scale* [Online] [http://www2.gnb.ca/content/gnb/en/departments/postsecondary\\_education\\_training\\_and\\_labour/Skills/content/AdultLearningAndEssentialSkills/oral\\_proficiency\\_ratingscale.html](http://www2.gnb.ca/content/gnb/en/departments/postsecondary_education_training_and_labour/Skills/content/AdultLearningAndEssentialSkills/oral_proficiency_ratingscale.html) (July 2017)