

# STRENGTHENING THE PART VII INFORMATION INFRASTRUCTURE FOR OFFICIAL LANGUAGE MINORITY COMMUNITIES: INSIGHTS FROM ENGLISH-SPEAKING QUEBEC

A brief presented to the Standing Senate Committee on Official Languages for its study on the regulatory framework of Part VII of the Official Languages Act

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# Executive summary

QUESCREN submits this brief in support of the Standing Senate Committee on Official Languages' study of the draft Part VII regulations of the Official Languages Act. Drawing on its research and knowledge mobilization mandate, QUESCREN focuses on how information generated under the regulatory framework can be structured and made usable for learning, accountability, and parliamentary oversight.

We propose three complementary recommendations:

1. Use the regulations to require standardized documentation of Part VII implementation.
2. Clarify, in regulation or guidance, the public lifecycle of Part VII documentation.
3. Enable a centralized public access point ("one stop shop") for Part VII information.

Together, these measures would strengthen transparency and assessment.

## Introduction

The Quebec English-Speaking Communities Research Network (QUESCREN) submits this brief to contribute to the Standing Senate Committee on Official Languages (OLLO) study on the draft regulatory framework of Part VII of the Official Languages Act (OLA).<sup>1,2</sup>

### About QUESCREN

QUESCREN is a university-based research network housed at Concordia University in Montreal. It promotes the understanding and vitality of English-speaking Quebec through research, knowledge mobilization, networking, and outreach. QUESCREN is not a policy think tank or advocacy organization and will not provide legal interpretation here.

QUESCREN's contribution to the OLLO study relates to evidence. Our concern is information generated through the Part VII regulatory framework: how the information is produced, organized, mobilized, and made usable over time, for learning, accountability, and informed decision-making.

## The Draft Part VII Regulations

### Context

The OLA authorizes the Treasury Board of Canada to make regulations specifying "how federal institutions will fulfill their obligations in order to advance the equality of status and use of English and French in Canadian society, and to meet the commitments of the Government of Canada,"<sup>3</sup> that is, in regard to OLA

<sup>1</sup> Official Languages Act, RSC 1985, c 31 (4th Supp), ss 46(1)–(3), as amended by S.C. 2023, c 15, <https://laws-lois.justice.gc.ca/eng/acts/o-3.01/>.

<sup>2</sup> Thanks to my QUESCREN colleagues Simon-Pierre Lacasse, Patrick Donovan, and Brian Lewis for comments on a draft version of this brief.

<sup>3</sup> Government of Canada, "Regulations for Advancing the Equality of Status and Use of English and French (Part VII Regulations)" [background information webpage], Government of Canada website, accessed April 12, 2026, <https://www.canada.ca/en/treasury-board-secretariat/topics/values-ethics/official-languages/modernization-official-languages-act/regulations-equality-english-french-part-vii.html>.

Part VII. The Treasury Board Secretariat (TBS) tabled the draft regulations in Parliament on December 9, 2025. Under the name “Draft Official Languages advancement of equality of status and use of English and French regulations,” they are now available online on the Government of Canada website.<sup>4</sup> The tabled document, available in pdf form, has the same contents but numbers the regulations.<sup>5</sup> For ease of reference, the present brief will refer to this numbered version.

The development of regulations under Part VII reflects a governance shift toward a Treasury Board–led compliance model for the Official Languages Act, with increased emphasis on structured analysis, documentation, and oversight across federal institutions. The regulations introduce standardized processes such as impact analysis, consultation, and monitoring. They aim to ensure that federal action under Part VII leads to meaningful results for official language minority communities.

## Contents

The Part VII draft regulations apply to most federal institutions, excluding parliamentary bodies and offices explicitly listed.<sup>6</sup> The following summarizes the contents of the draft regulations:

- Defines the Act and “initiative,” excluding internal administrative actions.
- Applies to federal institutions, excluding specified Parliamentary bodies.
- Positive measures and mitigation of negative impacts must be considered at major decision points for programs, policies, and initiatives.
- Impact analyses must assess effects on Part VII commitments, affected communities, possible measures, implementation options, and evaluation mechanisms, including for intergovernmental agreements.
- Analytical results must be documented.
- Engagement with linguistic minority communities and stakeholders through dialogue and consultation activities must inform analyses and measures.
- Official languages objectives and evaluative provisions must be integrated into Provincial and Territorial Government Agreements and reported to Treasury Board.
- Evaluation and monitoring mechanisms must verify compliance and assess the effects of measures.
- Regulations must be reviewed every ten years and reported to Parliament.
- Regulations take effect upon registration.

<sup>4</sup> Treasury Board of Canada Secretariat, “Draft Official Languages advancement of equality of status and use of English and French regulations,” Government of Canada website, accessed April 12, 2026, <https://www.canada.ca/en/treasury-board-secretariat/topics/values-ethics/official-languages/modernization-official-languages-act/regulations-equality-english-french-part-vii/official-languages-advancement-equality-status-use-english-french-regulations.html#toc-10> .

<sup>5</sup> Treasury Board of Canada Secretariat, “Official Languages (Advancement of Equality of Status and Use of English and French) Regulations,” Version 2025-11-07 (17:16) [PDF].

<sup>6</sup> The regulations do not apply to the Senate, House of Commons, Library of Parliament, office of the Senate Ethics Officer, office of the Conflict of Interest and Ethics Commissioner, Parliamentary Protective Service and office of the Parliamentary Budget Officer. Source: Treasury Board of Canada Secretariat, “Draft regulations.”

# Framing the Question

Considering our expertise in knowledge production and mobilization, we ask: **how will Parliament, researchers, communities, and federal institutions know whether the regulatory framework achieves its intended objectives?**

Our particular interest is the information system revealing how Part VII regulations translate into meaningful gains in community vitality.

## Situation

The following observations describe key features of the current Part VII information ecosystem. Together, they shape how implementation can be understood, assessed, and learned from.

### The regulations depend on a government information ecosystem

As a starting point, we observe that Part VII regulations describe an information ecosystem involving data gathering and document production and management.

Part VII regulations call for this information to be created:

- Regulation 4 requires institutions to conduct analyses at multiple stages of programs, policies, initiatives, and intergovernmental agreements. The analyses must identify affected communities, anticipated impacts, potential positive measures, mitigation strategies, and mechanisms for evaluation and monitoring, and regulation 4 (5) requires institutions to record results of these analyses. This would entail records that capture reasoning, options considered, and expected effects
- Regulation 6 says that these analyses should be based on stakeholder consultations that federal institutions organize and report on in writing. The institutions also invite participants to provide further written comments.
- Regulation 5 refers to Dialogue activities which government would also want to document.
- Crucially, regulation 8, Compliance and Effects, indicates that evaluation and monitoring mechanisms must assess not only compliance, but also the effects of measures taken in relation to community priorities and specified domains such as education, culture, health, justice, and immigration. Again, this would presumably involve substantial written analysis and reporting.

### There is a regulatory gap in information management

Taken together, these obligations imply that federal institutions will continually generate large amounts of qualitative and analytical information. The regulations assume that this information will exist, persist over time, and be retrievable for monitoring, coordination, and eventual parliamentary review.

However, the Part VII regulations do not address how this information will be organized, made visible, or used beyond individual institutional files. There is a gap between the mandate for information production and guidance on how to produce it.

## There are challenges stemming from this gap

Consequently, the Part VII information ecosystem represents potential challenges for policy makers and policy implementors as well as the public, including:

### *The regulations do not address public availability of Part VII documentation*

The draft regulations do not specify whether the documentation they call for, some of which would presumably be “behind the scenes” Part VII implementation materials, will be available to the public.

### *Information is fragmented*

OLA-related reporting already exists, and some is publicly available across multiple federal instruments. Information on compliance and implementation can be found in Treasury Board annual reports on official languages, departmental results reports, and reports of the Commissioner of Official Languages, for instance. However, this information is dispersed throughout documents and platforms.

To QUESCREN’s knowledge, there is no centralized, publicly accessible infrastructure bringing it together.

### *Information varies in format and is a challenge to access*

Existing information on Part VII implementation is presented in a range of formats and levels of detail. There does not appear to be standardized formats for structuring, organizing, and describing (through associated metadata, including naming conventions for document titles, versions, authors, dates, and descriptive fields) the documentation. Such variability hinders consistent identification and retrieval.

### *Information focuses on process, not results*

Some current Part VII documentation is narrative, self-reported, and oriented toward describing activities undertaken rather than effects achieved. As a result, while compliance may be formally reported, it remains difficult for stakeholders to assess Part VII impacts on community vitality. Moving to the draft regulations, TALQ raised a related concern in its Part VII draft regulations brief, arguing that “[t]he draft Regulations operationalize process, not outcomes.”<sup>7</sup>

Combined with format variability, this makes it difficult for Part VII information users to aggregate information and get a clear, cumulative view of federal actions or their effects across information and over time.<sup>8</sup>

### *There is a policy and research capacity issue*

As a result of this situation, research networks and organizations serving official-language minority communities across Canada can have difficulty assessing and keeping up with Part VII developments. Keeping up on them takes time and expertise not always available, given the above-mentioned issues and a context of limited resources and competing priorities.

These gaps are also evident at the policy level. In its brief on the draft regulations, TALQ identified areas where the absence of clear and accessible information undermines consistency and accountability:

- “There is no requirement for institutions to justify why specific positive measures identified by the official language minority community were not adopted.

<sup>7</sup> TALQ, “Brief: Senate Standing Committee on Official Languages (OLLO): Draft Regulations under Part VII of the Official Languages Act” (Ottawa, February 2026), 2, [https://sencanada.ca/Content/Sen/Committee/451/OLLO/briefs/2026-01-30\\_OLLO\\_SS-3\\_Brief\\_TALQ\\_e.pdf](https://sencanada.ca/Content/Sen/Committee/451/OLLO/briefs/2026-01-30_OLLO_SS-3_Brief_TALQ_e.pdf)

<sup>8</sup> Thanks to Stephen Thompson, LLM, Independent Researcher and QUESCREN researcher-member, who provided this (OR: some of this - depending on how I write it) information.

- “The draft Regulations are silent on how competing statutory obligations—particularly in Quebec—are to be balanced.
- “Core analytical concepts (community, vitality, impact) remain undefined, undermining consistency and comparability.”<sup>9</sup>

The fragmentation and process-oriented framing of Part VII information may help explain a broader research issue: the limited visibility of the OLA as a whole in academic research on minority communities. QUESCREN has found that researchers rarely focus on the OLA.<sup>10</sup> One plausible reason is that existing Part VII reporting does not make the Act’s practical effects readily visible or intelligible to external researchers.

## Federal policy calls for transparency and data direction

The federal government already has strong, explicit commitments to transparency, discoverability, and public accessibility of information. These include:

- The [Directive on Open Government](#) emphasizing publication, usability and discoverability of public information;
- The [Trust and Transparency Strategy](#), which links transparency to public trust and accountability;
- The [Policy on Service and Digital](#), which requires information to be user-centred;
- The [Data Strategy for the Federal Public Service](#), which promotes centralized stewardship and common standards.

More specific to our topic, principles that the Office of the Commissioner of Official Languages set out in *Making Progress Toward Substantive Equality* point implicitly to the need for a structured information and documentation infrastructure to support Part VII implementation. The Commissioner emphasizes the importance of clearer instructions, government-wide guidelines, defined internal responsibilities, and enhanced transparency and accountability.<sup>11</sup>

<sup>9</sup> TALQ, “Brief,” 2.

<sup>10</sup> Lorraine O’Donnell and Patrick Donovan, “Resources on English-Speaking Quebec: A Field Map,” *Minorités linguistiques et société / Linguistic Minorities and Society*, no. 20 (anniversary issue, 2023): 18, <https://www.erudit.org/en/journals/minling/2023-n20-minling07553/1110172ar/>.

<sup>11</sup> Office of the Commissioner of Official Languages, “Making Progress Toward Substantive Equality: Principles to Guide the Development of Regulations for the Implementation of Part VII of the Official Languages Act” (Gatineau, QC: OCOL, April 24, 2024), esp. 9–10 (“Problems with the Implementation of Part VII Throughout the Years”) and 10-12 (“Guiding Principles for Robust Part VII Regulations”), <https://www.clo-ocol.gc.ca/sites/default/files/2024-04/making-progress-toward-substantive-equality.pdf>.

# An Illustrative Case: Building Information Infrastructure for English-Speaking Quebec

These issues in the Part VII information ecosystem are clearer when compared with that of English-speaking Quebec (ESQ).

Information on ESQ used to be dispersed across disciplines and institutions and hard to find. QUESCREN has built infrastructure to address these knowledge ecosystem weaknesses. The infrastructure consists of online resources that gather information in various formats and describe and categorize them consistently:

- The [Bibliography on English-Speaking Quebec](#) for research documents. Volunteer Brendan O'Donnell provides the content;<sup>12</sup>
- The Community Knowledge Open Library ([CKOL](#)) for community-based grey literature like annual reports and newsletters;
- The Data Portal on English-Speaking Quebec ([DESQ](#)) for statistical datasets;
- The [ILET Research Hub](#) for research on education.

Their content is discoverable and accessed in one central place, the QUESCREN [website](#). This strengthens research capacity, reduces duplication of effort, and facilitates evidence-informed decision-making and dialogue.

For example, the Bibliography enabled QUESCREN staff to analyze a vast research corpus (14,400+ resources at the time of publication) on the topic of English-speaking Quebec. We mapped what was known, where gaps existed, and how findings aligned or diverged across sectors in a scholarly [article](#).<sup>13</sup> This kind of meta-analysis is useful. It allows knowledge users to see not just individual initiatives, but patterns and areas of research underdevelopment.

In short: there is a “one-stop shop” for information on English-speaking Quebec, but not for Part VII implementation. This affects to both of Canada’s official language minority communities. Lacking an integrated view of federal actions and their effects, OLMCs and Parliament cannot easily assess what is working and where impacts are uneven.

<sup>12</sup> Brendan O'Donnell (no relation to the author) created the bibliography and has provided its content for 50 years. For this achievement, he was awarded the Sovereign's Medal for Volunteers and other distinctions.

<sup>13</sup> O'Donnell and Donovan, “Field Map.”

# Recommendations

## 1. Use the regulations to require standardized documentation of Part VII implementation

The draft regulations already require documentation including analyses, consultation reports, and evaluation and monitoring materials. The regulations could be strengthened by specifying that this documentation be captured in a standardized, comparable format, enabling aggregation and assessment across institutions and over time.

## 2. Clarify, in regulation or guidance, the public lifecycle of Part VII documentation

The regulations could be supported by guidance clarifying which categories of Part VII documentation may be made public, and at what stage. This would ensure transparency and support informed assessment and understanding.

## 3. Enable a centralized public access point as part of the regulatory framework

The regulations could be supported by accompanying Treasury Board guidance enabling the establishment of a centralized public access point (“one-stop shop”) for Part VII information generated under the regulatory framework. Such guidance would translate regulatory requirements into a durable information infrastructure, supporting Parliament, communities, and researchers in assessing cumulative implementation and effects over time.

Existing federal institutions with relevant mandates and expertise, such as Library and Archives Canada in digital stewardship and discoverability, and the Office of the Commissioner of Official Languages in system-wide oversight, could be considered as potential partners in supporting or housing such a resource.

# Potential benefits of implementing these recommendations

Implementing these recommendations would produce the following benefits:

- Federal institutions would document analyses, decisions, and measures consistently, supporting coherent oversight and evaluation, and facilitating a shift from process-based compliance toward evidence-based assessment of impacts on official language minority communities.
- A centralized, public interface for Part VII information would align official-languages practice with the federal government’s existing commitments to digital transparency and support independent analysis and informed participation, accountability, and continuous improvement.

# Complementary considerations: The OLMC knowledge ecosystem

Alongside improvements to the information infrastructure within government, there would be value in enhancing neutral, non-advocacy capacity within the OLMC research ecosystem.

Such capacity development would focus on:

- monitoring policy and regulatory developments;
- consolidating publicly available documentation;
- and sharing information in accessible formats (e.g., brief updates or periodic newsletters).

This function would complement existing government efforts and community advocacy roles.

## Conclusion

QUESCREN's experience stewarding research platforms has been developed on the understanding that information becomes knowledge when it can be located and used. Fragmentation erodes capacity; discoverability strengthens it.

QUESCREN observes that as things stand, there is a risk that Part VII will remain easier to comply with procedurally than to evaluate substantively. We recommend the creation of a new centralized, standardized, and accessible for Part VII information infrastructure. It would align Part VII implementation with the federal government's existing commitments to transparency, discoverability, and data stewardship.

Overall, this Part VII information "one-stop shop" would improve the ability of Parliament, communities, researchers and other knowledge users find and use Part VII implementation information. It is a durable approach that would strengthen accountability and support cumulative learning over time.

It would also enable forms of digital sovereignty for official-language minority communities. They would gain enhanced ability to understand and use evidence about federal actions, assess impacts independently, and engage governments on more informed and equal terms. This is especially valuable in complex minority contexts such as English-speaking Quebec's.