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Office of the Languages Commissioner of Nunavut  
Bureau du commissaire aux langues du Nunavut

# BUSINESS PLAN

2019 - 2022

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## 1. INTRODUCTION

The Languages Commissioner is an independent officer of the Legislative Assembly of Nunavut appointed on a five-year term by the Commissioner of Nunavut on the recommendation of the Legislative Assembly. The duty of the Languages Commissioner is established under section 22 of the *Official Languages Act* (OLA) and under section 28 of the *Inuit Language Protection Act* (ILPA).

The Languages Commissioner position was vacant since June 6, 2016 when the Legislative Assembly approved the five-year appointment of Helen K. Klengenber as Languages Commissioner on September 12, 2017.

In accordance with subsection 24(1) of the *Official Languages Act*, the Languages Commissioner is required to prepare annual reports which are tabled in the Legislative Assembly. The Languages Commissioner is also required to appear before the Standing Committee on Oversight of Government Operations and Public Accounts and before the Management and Services Board to account for annual reports and business plans.

## 2. MANDATE AND VISION

### MANDATE

The Languages Commissioner's mandate is to promote and safeguard the language rights of Nunavummiut enshrined in Nunavut's language legislation.

### VISION

In addition to her statutory aims and duty, the Languages Commissioner's wider vision is:

For the official languages to be central to everyday life in Nunavut  
and wherever they can be used to a greater degree

More specifically:

(*Official Languages Act* - OLA) Individuals are able to communicate with and receive services from the Government of Nunavut and its public agencies, the Legislative Assembly and its institutions, Nunavut courts and municipalities<sup>1</sup> in the official language of their choice.

(*Inuit Language Protection Act* - ILPA) Individuals are able to communicate with and receive services from the Government of Nunavut and its public agencies, the Legislative Assembly and its institutions, Nunavut courts, municipalities<sup>2</sup>, private sector organizations and federal departments, agencies and institutions in the Inuit language.

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<sup>1</sup> Municipalities need to provide communications and services in French or English if it is deemed that there is "significant demand." The Government of Nunavut has yet to provide a mechanism to identify what this "significant demand" is and to pass regulations under which municipalities are to provide services and communications in French or English.

<sup>2</sup> The ILPA applies to municipalities regardless of demand.

### 3. PRINCIPLES AND CONCEPTS OF INUIT QAUJIMAJATUQANGIT

The following general principles and concepts of *Inuit Qaujimaqatuqangit* apply in respect of the exercise of the powers and performance of the duties of the Languages Commissioner:

1. *Inuuqatigiitsiarniq*: respecting others, relationships and caring for people
2. *Tunnganarniq*: fostering good spirit by being open, welcoming and inclusive
3. *Pijitsirniq*: serving and providing for family or community, or both
4. *Aajiqatigiinni*: decision-making through discussion and consensus
5. *Piliriqatigiinni* or *Ikajuqatigiinni*: working together for a common cause
6. *Qanuqtuurniq*: being innovative and resourceful

### 4. RESPONSIBILITIES OF THE LANGUAGES COMMISSIONER

The Languages Commissioner has four main responsibilities:

#### **Ombudsman**

The Languages Commissioner reviews any possible breach of the language legislation by territorial institutions, municipalities, private sector organizations and federal departments, agencies and institutions. The Office can investigate, make findings and reports, mediate settlements, and informally suggest ways to redress language rights violations.

#### **Advocate**

The Languages Commissioner communicates with those obligated to provide language services to influence decision making, practices or policies on respecting language rights.

#### **Advisor**

The Languages Commissioner advises, assists and works with territorial institutions, municipalities, private sector organizations and federal departments, agencies and institutions on their service and communication obligations. The Office also informs Nunavummiut of their language rights.

#### **Monitor**

The Languages Commissioner monitors and examines the progress of territorial institutions, municipalities, private sector organizations and federal departments, agencies and institutions in meeting their obligations under Nunavut's language acts.

The Languages Commissioner's duties are the following:

- To inform Nunavummiut of their language rights
- To inform and advise territorial institutions, municipalities, private sector organizations and federal departments, agencies and institutions of their language obligations

- To monitor territorial institutions, municipalities, private sector organizations and federal departments, agencies and institutions' language services and communications with the public
- To inform municipalities, private sector and federal organizations of their language communication and service requirements pursuant to section 3 of the ILPA and assist them in the planning and implementation of their Inuit language plan
- To investigate, or facilitate resolution, and to recommend corrective actions
- To support and monitor the implementation of the Nunavut's language legislation

The Commissioner also has wider functions, including:

- Promoting language rights through the provision of opportunities to use the official languages
- Keeping under review the adequacy and effectiveness of the laws relating to the official languages rights
- Producing and publishing reports
- Carrying out research or studies
- Making recommendations to obligated bodies and giving advice to any person

## **5. CAPACITY**

The OLC has a total of seven positions. In addition to the full-time contingent of employees, the OLC has a contract with a legal firm to provide legal advice and assistance with mediation when required. Casual employees are also hired on a punctual basis. The positions are the following:

- Languages Commissioner
- Executive Secretary<sup>3</sup>
- Director of Strategic Planning and Policy
- Investigation and Research Officer – Inuit language
- Investigation and Research Officer - French
- ILPA Liaison Officer<sup>4</sup>
- Public Affairs Officer

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<sup>3</sup> The executive secretary position will become an executive assistant position during the 2019-2020 fiscal year.

<sup>4</sup> Years ago, this position was a private sector liaison officer (PSLO) position. It became a project manager position in 2016; it was an indeterminate position turned into a 3-year term because the person hired was not Inuk. The term was supposed to end on January 18, 2019, but when the employee resigned, the project manager position was cancelled and replaced by an ILPA liaison officer position (ILPA for Inuit Language Protection Act).



## 7. LEGISLATION

In Nunavut, there are two language acts, the *Official Languages Act* and the *Inuit Language Protection Act*, and three official languages: Inuktitut, English and French.

### **The *Official Languages Act* (OLA)**

The members of the Nunavut Legislative Assembly approved the OLA on June 4, 2008. After receiving royal assent, the OLA came into force on April 1, 2013. It creates obligations for territorial institutions, meaning the Government of Nunavut and its public agencies, Nunavut courts and the Legislative Assembly and its institutions, and requires these territorial institutions to provide their communications and services to the public in all the official languages, to the extent provided for in the legislation and regulations.

Also, these obligated bodies must provide an active offer and ensure that members of the public can communicate with and receive services from the head or central service offices in the official language of their choice, including other offices where there is significant demand for an official language, or due to the nature of the service (public safety, security and health).

In its application to Inuinnaqtun, the implementation of the *Official Languages Act* must address the need for language revitalization and improve access to government programs and services specifically in Kugluktuk and Cambridge Bay.

Municipalities also need to provide communications and services in French or English if it is deemed that there is a “significant demand” for services and communications in these official languages. The Government of Nunavut has yet to provide a mechanism to identify what this “significant demand” is and to pass regulations under which municipalities are to provide services and communications in French or English.

During the winter 2017 sitting, the Minister of Languages announced in the Legislative Assembly that the following paragraph of the OLA would come into force on July 9, 2017:

- Services being provided for territorial institutions through third-party contracts must be provided in all the official languages [OLA, paragraph 12(7) (c)]

The OLA created the position of minister responsible for languages to coordinate and guide the language service requirements that must be met by territorial institutions and municipalities.

### **The *Inuit Language Protection Act* (ILPA)**

The ILPA was approved by the members of the Nunavut Legislative Assembly on September 18, 2008. The Act seeks to protect, promote and revitalize the Inuit language throughout Nunavut. These statutes derive from the Government of Nunavut’s obligations to give effect to article 32.2.1 of the *Nunavut Land Claims Agreement* (NLCA), under which the Government of Nunavut must be responsive to Inuit language and linguistic needs in the context of its administration and governance.

Under the ILPA:

- Territorial institutions, municipalities and, since July 9, 2017, private sector organizations and federal departments, agencies and institutions have the obligation to communicate with and provide services to the public in the Inuit language.
- Parents have the right to have their children receive instruction in the Inuit language from kindergarten to Grade 3, and this service must be in place for all other grades by 2019–2020. In February 2017, the Department of Education tabled Bill 37, a bill proposing amendments to the *Education Act* and the *Inuit Language Protection Act*. The Standing Committee on Legislation recommended that Bill 37 not proceed further in the legislative process. The *Education Act* was rescheduled for review during the 5<sup>th</sup> Legislative Assembly.
- Employees of a territorial institution have the right to work in the Inuit language. The Government of Nunavut, under article 23 of the *Nunavut Land Claims Agreement*, has an obligation to achieve a workforce representative of the population across all employment categories.

During the winter 2017 sitting, the Minister of Languages announced in the Legislative Assembly that the following sections would come into force on July 9, 2017:

- Services and communications must be provided in the Inuit language by the private sector bodies, municipalities and federal departments, agencies and institutions (ILPA, section 3).
- Services being provided for territorial institutions through third-party contracts must be provided in all the official languages (ILPA, section 4).
- Provisions for Inuit language services in civil claims must be included in the Nunavut Court of Justice's rules or directions (ILPA, section 5).

The ILPA created the position of minister responsible for coordinating the implementation of policies. It also created the Inuit Uqausinginnik Taiguusiliuqtiit (IUT), the Inuit Language Authority.

**The Cabinet has yet to set an effective date for:** Early childhood education and adult language acquisition and development to be provided in the Inuit language (ILPA, sections 9 and 10).



## **8. CORE ACTIVITIES AND BUDGET**

The OLC works in three main areas: legislation, communications and policy, planning and investigations.

### **8.1. LEGISLATION**

At the Office of the Languages Commissioner (OLC), we believe that protecting citizens' language rights and ensuring that they are treated with respect and fairness is central to our work. The Office is supporting official languages users and working with obligated bodies in order to gain a better understanding of their experiences, needs and aspirations. Evidence gathered is used to help ensure compliance with the laws. By doing this, the Office aims to give people the assurance and confidence to use the official language of their choice in their everyday lives.

The OLC expects obligated bodies to comply with the legal duties imposed on them. When they fail to do so, the Office takes appropriate steps to ensure compliance with these duties and, by doing so, it ensures that the rights of official languages users are protected. To achieve this, the Office uses a variety of methods.

### **8.2. COMMUNICATIONS**

The Languages Commissioner recognizes the importance of language rights promotion; it is her duty to inform the public of its language rights, and to inform obligated bodies of their language obligations under the Nunavut's language legislation. It is important to raise Nunavummiut's awareness of language rights and the office's mandate.

The OLC's public awareness work takes many forms, including presentations, information sessions, community outreach, contests, developing information material, attending public events, and maintaining the Office's website and Facebook page. The OLC's website and Facebook page are important communication tools to Nunavummiut. The website is giving information on the OLC's mandate, legislation, language rights and obligations, concerns and publications. People can also use the online form to file concerns with the OLC when they feel their language rights may have been violated. Traditional means of communication (in person, by phone, email and mail) are still used to communicate with the Office.

Promotion of language rights happens through public education campaigns, public appearances, participation in the Inuit Language Month and Les Rendez-vous de la Francophonie, reports of findings and recommendations. All of these activities share one goal: to build and strengthen relationship with the public and obligated bodies.

Moreover, the OLC is developing a strategic plan and a communication plan in order to choose the best strategies and tactics to implement to reach the target audience. It is an effective way to set goals, target groups and activities to communicate in a coherent and effective manner.

### **8.3. POLICY, PLANNING AND INVESTIGATIONS**

The OLC examines, analyses and makes recommendations with regards to the proposed and existing language policies in territorial institutions, municipalities, private sector organizations and federal departments, agencies and institutions. Moreover, as section 3 of the ILPA came into force on July 9, 2017, the Office can now monitor private sector organizations and federal departments, agencies and institutions' compliance with this section of the Act.

Nunavummiut can contact the Office for information on language rights and obligations, and when they want to file a concern.

#### OLA

According to the OLA, territorial institutions are required to communicate with the public and provide services in all the official languages. They must also make an active offer of their services by informing members of the public of their right to communicate in their preferred official language and to receive communications and available services in that language.

A language rights concern with a territorial institution and a municipality can be filed with the Office of the Languages Commissioner by an individual, or on behalf of another person, group or community, when members of the public are not receiving services and communications in the official language of their choice, in accordance with sections 11 and 12 of the OLA.

A concern can be brought to the OLC in any of these circumstances:

- The status of an official language have not been recognized
- A provision of the OLA, or any other act or regulation relating to the status, use or protection of an official language has not been complied with
- The spirit and intent of the OLA or ILPA have not been fulfilled

The Languages Commissioner can also, on her own initiative, or at the request of a territorial institution, a municipality, a member or committee of the Legislative Assembly, commence an investigation without having received concerns directly from an a member of the public.

#### ILPA

A language rights concern with a territorial institution, a municipality, a private sector organization and a federal department, agency or institution can be filed with the Office of the Languages Commissioner when members of the public are not receiving services and communications in the Inuit language. The Languages Commissioner takes all actions and measures to ensure that the rights, status and privileges established by this Act with respect to the Inuit language are recognized and performed.

Also, according to section 11 of the ILPA, territorial institutions must provide an active offer, which means that there must be a "clear explanation in the Inuit Language of an individual's right to use the Inuit Language during recruitment or employment". Without the active offer, individuals may be shy or scared to use the Inuit language.

### Monitoring

To ensure that they are complying with subsections 12(7) and (8) of the OLA, the OLC monitors the availability of language services and communications and active offer within Nunavut's territorial institutions and municipalities. Surveys such as call verification, written communication and website reviews and email verification are useful measurement tools to collect data. The OLC also conducted a municipality survey and a survey on the right to work in the Inuit language in territorial institutions to monitor their compliance with sections 11 and 12 of the ILPA.

### Systemic Investigation

An investigation may take the form of a systemic investigation when non-compliance of language rights is seen as an endemic problem. The decision to conduct a systemic investigation is based on a list of criteria that follows ombudsman practices in Canada, such as:

1. The situation concerns major strategic issues.
2. It is a recurring problem.
3. A large number of people are potentially at risk.
4. The number of concerns received is important.
5. The recommendations made by the Languages Commissioner's Office were ignored.

The OLC conducted a systemic investigation to determine whether the QGH complied with its linguistic obligations as stated in OLA, between March 1, 2012 and March 31, 2013. The Office also wanted to describe the repercussions of language barriers on the quality of care and access to health care services and to make recommendations to fix the language issues.

### Ombudsman and Investigative Training

It is imperative for all the OLC employees to be informed and have up-to-date knowledge about investigation, ombudsman role and best practices. The OLC participated in the training offered by the federal Office of the Commissioner of Official Languages (Investigation Process) and the Ontario Ombudsman (Sharpening your teeth). Once the Office will be fully staffed, the OLC will again provide these trainings plus the training offered by York University and the Forum of Canadian Ombudsman (Essentials for Ombuds) to all employees.

#### 8.4. BUDGET

The Languages Commissioner has a budget of \$1,410,000 for 2019-2020:

Budget (\$000)	2018-2019	<b>2019-2020</b>	2020-2021	2021-2022
Directorate and operations	633	<b>628</b>	628	628
Communications	159	<b>159</b>	159	159
Policy, planning and investigations	618	<b>623</b>	623	623
<b>Total</b>	1,410	<b>1,410</b>	1,410	1,410

## 9. PRIORITIES

Throughout fiscal years, as also indicated in our annual reports, several activities were carried out. As many of these activities are recurrent, in the business plan, the focus is on key priorities. Please note that some of the following activities were not in the previous business plan; they added further to the activities already planned.

## 10. STATUS OF 2018-2019 PRIORITIES

### Legislation

- ✓ Initiate the review of the *Official Languages Act* and the *Inuit Language Protection Act*

**Status:** On-going. In order to be ready when the acts are to be reviewed, the OLC initiates their analysis in collaboration with its legal counsel.

- ✓ Finalize the protocol for access to the Nunavut Court of Justice for investigative purposes by the Languages Commissioner of Nunavut

**Status:** Completed. A new protocol is implemented.

- ✓ Review the legislative proposal, an amendment to the *Education Act*

**Status:** On-going. The OLC received a copy of the legislative proposal outlining planned amendments to the *Education Act* on July 27, 2018. A stakeholder meeting is planned for August and community consultations will take place in September and October 2018. The Department of Education intends to introduce a bill into the Legislative Assembly in winter 2019. The OLC will submit its comments.

- ✓ Meet with the Treasury Board of Canada

**Status:** On-going. As the OLC is facing resistance from the federal government regarding compliance with section 3 of the ILPA, the Languages Commissioner is working on this issue and trying to meet with the Treasury Board of Canada.

- ✓ Review Bill 49, an amendment to the Nunavut *Elections Act*

**Status:** On-going. In the past, the Office of the Languages Commissioner received complaints respecting territorial elections administered by the Chief Electoral Officer. The latter has challenged the application of the *Official Languages Act* to his office and to elections held pursuant to the Nunavut *Elections Act*. The OLC wants to ensure that linguistic obligations to provide communications and services in all the official languages to the public are respected.

## Communication

- ✓ Develop an advertising campaign on language rights

**Status:** Completed. Each year, the OLC develops communication tools and promotional activities for the Inuit Language Month (February 2018) and Les Rendez-vous de la Francophonie (March 2018). The OLC promotes language rights by using print and radio ads and its Facebook page, and holds a contest. The OLC also meets with various organizations and talks about its role, mandate and language rights and obligations.

The Languages Commissioner continues to talk about the right to work in the Inuit language in territorial institutions, through CBC Radio, in Inuktitut and English.

- ✓ Review the communication tools

**Status:** On-going. The OLC drew up informative material on section 3 of the ILPA and is now producing leaflets. The Office is also updating the existing leaflets on language rights.

- ✓ Review the OLC's website

**Status:** On-going. Reviewing the content of the OLC's website was put on hold as the OLC was understaffed; it is now one of the priorities of the new Public Affairs Officer.

- ✓ Assist and participate in the Ministerial Conference on the Canadian Francophonie that the Department of Culture and Heritage is planning for June 2018

**Status:** Postponed. The Department postponed the conference to June 2019 due to conflicts with other activities.

- ✓ Assist and participate in the Nunavut Inuit Language Conference that the Department of Culture and Heritage is planning for June 2018.

**Status:** On-going. The Department postponed the conference to September 10-14, 2018, again to March 2019. The Languages Commissioner will participate as a speaker and panelist; the OLC has also offered to assist with photocopying and providing input in the planning of the conference.

- ✓ Develop a communication plan for the Office of the Languages Commissioner

**Status:** On-going. A draft communication plan is ready; the final plan will be ready by December 2018.

- ✓ Inform private sector organizations and federal departments, agencies and institutions of their language obligations

**Status:** On-going. When section 3 of the ILPA came into force on July 9, 2017, we hired a casual private sector liaison officer, wrote informative material and did a mailing to 500 organizations to inform them of their obligations. We are providing assistance to these organizations in the planning and implementation of their Inuit language plan and, if needed, their accommodation request.

- ✓ Participate in the *Indigenous Languages Act* consultation

**Status:** Completed. The OLC has met with the Inuit Tapiriit Kanatami (ITK) and participated in the consultation organized by the federal Department of Canadian Heritage held in Iqaluit on July 18, 2018. The Office will follow this file up.

### **Policy, Planning and Investigations**

- ✓ Monitor territorial institutions' language services through written communication review

**Status:** Completed. The OLC attributes a score to territorial institutions issuing written communications that are published on Outlook. Communications have to be published simultaneously in all the official languages.

- ✓ Monitor territorial institutions' right to work in the Inuit language

**Status:** On-going. As the OLC conducted a survey on the right to work in the Inuit language in territorial institutions in 2017, the Office will not conduct another one in 2018-2019; it is postponed to 2020-2021. During the 2018-2019 fiscal year, the Office will provide feedback to territorial institutions on the its survey (findings and recommendations) concerning the right to work in the Inuit language.

- ✓ Monitor territorial institutions' language services through website review

**Status:** Completed. A website review has been conducting to monitor whether the information provided on the website of territorial institutions is available in all the official languages. The OLC monitored the website of territorial institutions by examining three levels of links from the menu, namely the main menu, the submenus and all the links contained in the menus. About 2,900 pages were verified.

- ✓ Follow up on the five-year review of the implementation of the OLC's recommendations

**Status:** Postponed. As the OLC is understaffed, the activity is postponed to 2019-2020.

- ✓ Follow up on recommendations received from the Standing Committee on Public Accounts, Independent Officers and Other Entities

**Status:** Postponed. The former Languages Commissioner last appearance before the Standing Committee was in November 2015 and her last appearance before the Management and Services Board was in March 2016. After, the position was vacant from June 2016 to June 2017. The next appearance before the Standing Committee might be by March 2019. The activity is postponed to 2019-2020.

- ✓ Prepare a strategic plan for the OLC

**Status:** On-going. The OLC has had a two-day meeting on strategic planning. An orientation document was distributed to all employees before the meeting and the Office has determined the OLC's objectives, strategies and tactics. The strategic plan is being written.

- ✓ Review the investigation process

**Status:** Postponed. As the OLC is understaffed, this activity has been postponed. The Office wants to update the current information on the investigation procedure and to prepare a guide on this topic.

## 11. PRIORITIES FOR 2019-2020

### Legislation

- ✓ Review the Department of Education legislative proposal, an amendment to the *Education Act*, and prepare a submission
- ✓ Conduct information sharing meetings on language legislation with deputy ministers and senior officials from all departments

### Communications

- ✓ Develop an advertising campaign on language rights
- ✓ Develop an advertising campaign on the OLC's roles
- ✓ Work with private sector organizations and federal departments, agencies and institutions on the planning and implementation of their Inuit language plan
- ✓ Travel in 4 communities and organize information sessions on language rights
- ✓ Develop a policy and procedure guide based on the Office's requirements

### Policy, Planning and Investigations

- ✓ Monitor territorial institutions' language services through call verification



- ✓ Audit the Department of Health and the Qikiqtani General Hospital to determine their progress in complying with the OLC's recommendations (systemic investigation report)
- ✓ Follow up on recommendations received from the Standing Committee on Public Accounts, Independent Officers and Other Entities
- ✓ Provide staff training and professional development initiatives
- ✓ Develop a guide on investigation procedure
- ✓ Provide feedback to territorial institutions on the OLC's survey results
- ✓ Follow up on the five-year review of the implementation of the OLC's recommendations

## **12. PRIORITIES FOR 2020-2021**

### **Communications**

- ✓ Develop an advertising campaign on language rights
- ✓ Develop an advertising campaign on the OLC's roles
- ✓ Inform private sector organizations and federal departments, agencies and institutions of their language obligations under the *Inuit Language Protection Act*
- ✓ Travel in 4 communities and organize information sessions on language rights

### **Policy, Planning and Investigations**

- ✓ Monitor territorial institutions' implementation of OLC's recommendations regarding the right to work in the Inuit language
- ✓ Monitor private sector and federal organizations' language services through a survey
- ✓ Follow up on recommendations received from the Standing Committee on Public Accounts, Independent Officers and Other Entities
- ✓ Provide staff training and professional development initiatives

## **13. PRIORITIES FOR 2021-2022**

### **Communications**

- ✓ Develop an advertising campaign on language rights
- ✓ Develop an advertising campaign on the OLC's roles
- ✓ Travel in 4 communities and organize information sessions on language rights

### **Policy, Planning and Investigations**

- ✓ Monitor territorial institutions' language services through written communication review
- ✓ Monitor territorial institutions' language services through website review
- ✓ Monitor territorial institutions' language services through email verification

- ✓ Inform private sector organizations and federal departments, agencies and institutions of their language obligations under the ILPA and providing them with assistance in the planning and implementation of their Inuit language plan and, if needed, their accommodation request.
- ✓ Follow up on recommendations received from the Standing Committee on Public Accounts, Independent Officers and Other Entities
- ✓ Provide staff training and professional development initiatives

**14. MAIN ESTIMATES FOR 2019-2022**

BUSINESS SUMMARY	2018-2019		2019-2020		2020 – 2021		2021 – 2022	
	Main Estimates		Planned		Planned		Planned	
	\$0	PYs	\$0	PYs	\$0	PYs	\$0	PYs
<b>DIRECTORATE AND OPERATIONS</b>								
Salary	291	2	286	2	286	2	280	2
Grants and Contributions	—		—		—		—	
Other O&M	342		342		342		348	
<b>Subtotal</b>	633		628		628		628	
<b>COMMUNICATIONS</b>								
Salary	129	1	129	1	129	1	129	1
Grants and Contributions	—		—		—		—	
Other O&M	30		30		30		30	
<b>Subtotal</b>	159		159		159		159	
<b>POLICY, PLANNING AND INVESTIGATIONS</b>								
Salary	570	4	575	4	575	4	575	4
Grants and Contributions	—		—		—		—	
Other O&M	48		48		48		48	
<b>Subtotal</b>	618		623		623		623	
<b>TOTAL</b>	1 410	7	1 410	7	1 410		1 410	7

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