



# Best Practices in Municipal Oversight

## A Practitioner Toolkit

## About:

### Author:

This toolkit was prepared by Adoree Kim, PhD Candidate at Cornell University.

### What is CAPI?

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## Practitioner Toolkit Series



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In June 2017, CAPI hosted Global Cities II, a conference that brought together cities from around the world to discuss anti-corruption efforts and share ideas for how to solve common problems. One major topic of discussion was oversight. This practitioner toolkit was conceived out of a breakout session on the topic of oversight, during which nearly 30 integrity professionals from CAPI's city delegations brainstormed about the most important features of successful municipal oversight bodies. The resulting list of the most important qualities for oversight offices formed the backbone of this toolkit on best practices for municipal oversight entities. The toolkit was then supplemented by additional research and interviews with numerous practitioners.

Obviously, oversight agencies differ dramatically in both mandate and function, and it is important to remember that oversight bodies exist in varying legal, cultural, and institutional atmospheres. The Association of Inspectors General, which provides a rich source of guidance in terms of the creation of an oversight body, notes that “[t]he fact that each OIG is different and approaches its mission within widely differing contexts precludes prescription of a consistent” set of principles, practices, and tools for oversight bodies. Notwithstanding the diversity among oversight offices, three features of successful oversight bodies emerged as virtually required for successful oversight: *independence*, *jurisdiction/powers*, and *accountability*. The following sections expand upon these three features. We then provide some additional thoughts on topics that practitioners also deemed important to success: building public trust; protection for whistleblowers and witnesses; requirements for employees to report corruption; and cross-agency coordination.<sup>1</sup>

## Oversight Agency Independence

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Both the literature<sup>2</sup> and practitioner feedback suggest that an oversight body's independence is essential to its proper functioning. In other words, the extent to which the agency operates autonomously from the influence of political actors, special interests, and especially the bodies it oversees will largely determine its effectiveness.<sup>3</sup>

What, then, comprises independence? There are various types and subcategories of independence.<sup>4</sup> This toolkit will focus on several elements deemed critical by scholars and practitioners alike: legal protection of the entity, an independent budget, job protection of the agency head, and organizational autonomy.

### Legal Status

[An oversight body should be formally established as a legal entity by statute or ordinance](#)—this protects the agency from arbitrary reform and dismantlement. Oversight agencies established by discretionary act, on the other hand, “[lack a basis for legal existence and can be eliminated at any time at the discretion of a policy leader](#).” A 2015 study of 159 offices of inspectors general in the United States found that [68% were established by statute or ordinance, while only 32% were established by discretionary act](#).

Moreover, the Association of Inspectors General (AIG) recommends that the statute or ordinance establishing the oversight body stipulate the agency's “[mandate, authority, and powers](#),” as well as the [funding mechanism, appointment and removal procedures, term limits, and organizational placement](#). These elements should be clearly specified in the establishing legislation in order to prevent arbitrary alterations.

### Creation through State Constitution

An even stronger form of protection is enshrinement in a state's constitution. While no municipal oversight bodies have been created by state constitutions to date, eight states – Colorado, Florida, Hawaii, Louisiana, Oklahoma, Rhode Island, Texas, and Utah – have mandated the creation of ethics commissions to conduct oversight on a state level, and have provided those bodies with varying levels of protections and powers. For more information, see CAPI's upcoming publication on state constitutions and mandated ethics bodies, to be published in fall 2017.

## Budgetary Independence

Budgetary independence is important to ensuring autonomy and depoliticizing the agency. The watchdog's funding mechanism should provide it with sufficient financial resources "[without subjecting \[the oversight body\] to internal or external impairments \[of\] its independence.](#)" Thus, an independent budget is one that provides the agency with 1) *sufficient financial resources* to perform its operations, and 2) is *secure and removed* from annual political budgeting processes.

A lack of consistent and sufficient funding can be seen as symptomatic of a "[lack of genuine commitment](#)" in the government to fight corruption. This is [often a problem for new oversight agencies](#), as budgets may depend on how developed (read successful) the program is. This places oversight entities in a difficult position, as they must have a sufficient budget before they are able to produce tangible results.

Ideally, the agency budget should also be *fixed* as opposed to *vulnerable to fluctuation*, in terms of the ability of others to alter it.<sup>5</sup> A guaranteed and fixed budget appropriation shields an oversight body from politically motivated defunding. Without such provisions, budgets "fluctuate depending on who is pulling the political strings."<sup>6</sup> For instance, political actors may seek to prevent or paralyze unwanted investigations by decreasing the oversight agency's budget.<sup>7</sup>

An independent budget is best secured by a statute (or other legally binding provision) providing a fixed appropriation from the legislature. A prime example is the Montreal OIG, which is statutorily allotted 1% of the city's total budget each year.<sup>8</sup> Direct appropriations from the legislature ensure that the government entities the agency oversees "[\[d\]o not have budgetary authority over its overseer.](#)" The [Miami-Dade OIG](#) employs a hybrid method of funding, where it receives ¼ of 1% of almost all contracts in the county, plus have the ability to seek additional funding to supplement that amount.

For oversight offices located within agencies and departments, as many OIGs are, funding is often drawn from the general funds of the overseen entity. For such cases, the AIG suggests a statutory provision stipulating that the oversight office "[will receive no less than \(x percent\) of the General Funds annual appropriation each year.](#)" This method of funding aims to ensure that the OIG will receive a guaranteed level of funding each year, directly proportional to the funds allocated for the agency within the OIG's jurisdiction. Critically, this funding scheme guarantees the office a certain proportion of funding each year and preempts political retaliation against the office through defunding.

## Appointment and Removal

According to oversight practitioners and scholars alike, another vital component of independence is the mechanism for appointment, tenure, and removal of the head of the oversight entity.<sup>9</sup> Appointment and removal procedures for the head of the agency should be transparent and designed to preclude the exercise of undue influence.<sup>10</sup> Although the ideal practice may vary with the type of oversight body, the AIG recommends that inspectors general

be appointed either by the chief executive with the advice and consent of the legislative body, by the legislative body itself, or by a [“government official with a position equal to or higher than”](#) the head of the agency overseen.

The terms of removal for the oversight agency head are particularly important. Without adequate job protection, agency heads face the threat of arbitrary removal, undermining the agency’s ability to monitor and investigate corruption. The establishing ordinance or statute should therefore contain specific language preventing agency heads from being removed *except for cause* within the appointed term by the appointing authority. Moreover, the appointing authority should be required by legislation to [“report the reasons for removal to the body that approved the appointment.”](#)

Whether appointments should be renewable is open to debate. Although the AIG suggests a five-year renewable term for OIG heads, certain practitioners suggested that a single fixed term helps further depoliticize the office by removing the incentive for heads to seek reappointment.<sup>11</sup>

## Organizational Placement

Oversight agencies that are structurally autonomous typically exercise greater independence than those that are organizationally and physically enmeshed in the agencies they are designed to oversee.<sup>12</sup> Practitioners and policymakers should structure oversight bodies to [“maximize independence from operations, programs, policies, and procedures over which the OIG has authority.”](#)

In particular, the structure of reporting can influence independence. Many oversight agencies, particularly OIGs of specific agencies and departments, are designed to report directly to the head of the overseen entity, creating opportunities for excessive meddling. For instance, the inspector general of the former Kansas Health Policy Authority (KHPA), a position created in 2007 by the Kansas state legislature to conduct audits and investigations of the KHPA, was statutorily required to report directly to the KHPA Executive Director. [The KHPA Executive Director interfered in OIG operations](#), including dictating what the oversight agency could and could not monitor. In New York, the Department of Investigation oversees all city agencies, with an individual Inspector General assigned to each agency. These IGs used to sit within their respective agencies, but in the 1980s [the IGs were moved to DOP’s central office to report to the DOI Commissioner](#), to avoid the possible influence that may come with working too closely with the agency being overseen.

To bolster structural autonomy, the AIG recommends that the OIG legislation require the oversight body to not only “repor[t] to the appointing authority” but also report “to the legislative body of the agency.” Likewise, scholars suggest that oversight agencies should report to “statutorily created governing bod[ies], the majority of whose members are independently elected or appointed and who come from outside the organization being audited.” For instance, reporting to the full KHPA Board instead of the KHPA Executive Director on substantive issues may have ensured [“that the OIG would be free from any impairment to its independence that could hypothetically be imposed by an Executive Director.”](#)

Many municipal OIGs report to the city council, an arrangement that can be either innocuous or problematic depending on the willingness of the council itself to support oversight efforts. Policymakers and practitioners should carefully design reporting structures, to the extent possible, to protect the agency from potentially disruptive influence. In New York, [the DOI Commissioner reports to both the City Council and the Mayor](#). The Miami-Dade Inspector General reports both to the [Mayor and the County Board of Commissioners](#).

### Case Study: Independence in Montreal's Office of the Inspector General

The Montreal OIG was created in early 2014 as a response to a public scandal concerning widespread corruption in the city's public contracting process. Since then, the OIG has had increasing success in identifying and combating corruption in the city's contracting and procurement functions.

The appointment of Montreal's Inspector General by at least a two-thirds majority of the City Council grants the IG a measure of independence from the administration. The IG's non-renewable five-year term, a position removable only with cause by a two-thirds majority of the City Council, further depoliticizes the office. Independent funding ensures autonomous oversight operations: the OIG's budget is fixed by statute, automatically allotting the office 1% of the city's total budget.<sup>13</sup>

## Oversight Agency Powers and Jurisdiction

The second major feature that successful oversight agencies must possess is meaningful powers to fulfill their function. It almost goes without saying that watchdog agencies must have authority and discretion to investigate corruption and enforce public ethics rules.<sup>14</sup> Although powers and jurisdiction will necessarily differ according to the agency's type and mandate, scholars and practitioners alike find common ground in what powers are critical to effective oversight operations.

### The Scope of Agency Jurisdiction

Strong oversight agencies possess various investigative powers, such as the power to "audit, inspect, evaluate, and investigate the activities, records and individuals affiliated" with the government entity or contracts undertaken by the entity, conduct "criminal, civil and administrative investigations," and refer a matter for prosecution. Some are also authorized to partner with state and federal law enforcement to investigate violations.

The consensus among practitioners at CAPI's Global Cities II conference was that oversight efforts should also expand beyond investigatory capacities to take on a more "holistic" approach, including prevention, auditing, and community education.<sup>15</sup> While investigations have been called a "reactive, or post-factum, approach to oversight," auditing is a "[proactive, or pre-factum, approach](#)." In the end, "[\[b\]oth approaches are necessary](#)."

Moreover, agencies should seek to prevent fraud and abuse through preventative operations including reviewing legislation, regulations, procedures, and other proposed government activity. Furthermore, oversight agencies should be actively engaged in training government employees and educating the community about corruption and anti-corruption efforts.

That being said, of course, not all of these functions may be within the scope of a particular oversight body's jurisdiction. For example, sometimes audit functions are handled separately, perhaps by a City Auditor or Comptroller.

## Subpoena Powers and Access to Information

In order to properly investigate alleged misconduct, [oversight agencies must be able to obtain evidence and other necessary information](#). An oversight agency should have the “[t]he right to obtain full and unrestricted access to all records, information data, reports, plans, projections, matters, contracts, memoranda, correspondence and any other material” from the government entity being investigated.

[Unfettered access to public records](#) has been particularly essential for police oversight bodies. It is becoming more common for police oversight agencies to have such access: According to one study, more than two-thirds reported that they always or sometimes had access to closed internal investigations.<sup>16</sup>

Oversight agencies must be able to subpoena witnesses and documents, and require testimony under oath. The power to compel production of witnesses and documents has proven to be an effective tool in investigation of private misconduct, and is particularly valuable for oversight agencies. Many cities provide their watchdog agencies with these powers, including [New York](#) and [Chicago](#).

## Other Powers

Many municipal oversight agencies lack formal enforcement powers. In certain cities around the world, however, oversight agencies possess the ability to do more than investigate cases, refer to law enforcement authorities, and issue recommendations and reports. For instance, the Montreal OIG, which deals solely with the oversight of municipal contracts, has the [power to annul](#) contracts for which the bidding process was found to involve collusion or fraud.

## Oversight Agency Accountability

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Oversight agencies must be incorruptible.<sup>17</sup> According to the AIG, employees at oversight agencies must be “[held to the same or higher expectations \[as\] other government officials](#)” in using public resources responsibly and maintaining professional standards. Because of the ongoing risk of failures of internal governance, developing a risk management framework and securing the oversight body against the potential misuse or abuse of powers should be considered a necessity.

Oversight agencies should take several steps [to ensure accountability to government bodies and to the public](#). First, agencies often provide regular comprehensive reports on performance and activities to the executive or legislative overseeing bodies; these reports should be readily accessible to the public. Second, agencies should implement internal quality assurance programs. Third, agencies should consider regular assessments by external reviewers. These recommendations are discussed in turn below.

## Reporting

The AIG recommends that oversight bodies “keep appropriate officials and the public properly informed” of their “activities, findings, recommendations, and accomplishments.” Although the substance and extent of the report may differ according to the oversight body, periodic and final reports should be issued to the appropriate entities “to the extent consistent with the law, including requirements imposed by confidentiality rules and the prosecutive system.”

Reports should summarize the oversight body’s “activities, findings, recommendations, and accomplishments,” including a list of each audit and inspection conducted, a list of matters referred to prosecutive authorities and the results of those referrals, a summary of recommendations for any changes in “statute, regulations or procedures governing the OIG,” and a description of recommendations issued in previous reports for which “corrective action [was not] completed” by the overseen entities.

Moreover, oversight agencies should release annual reports to the public summarizing their activities, as well as periodic reports discussing aspects of the above information appropriate for public release. Some examples of annual reports from oversight agencies come from [New York’s DOI](#), the [Philadelphia OIG](#), and the [Chicago OIG \(quarterly reports\)](#).

### Internal Quality Assurance

Oversight bodies “have a special responsibility to ensure that their own operations are as effective as possible.” Oversight agencies must therefore implement internal quality assurance programs that evaluate whether their activities and operations are in accordance with stated policies and procedures and ensure that they are economical, efficient, and effective. Keep in mind, of course, that these procedures will vary significantly depending on the jurisdiction and mission of the oversight body. For example, offices with a financial audit function will have highly specific accounting standards to follow; these will not apply to other entities.

The AIG discusses several important elements of an effective quality assurance program. In order to produce an objective evaluation, the assessments “should be conducted by individuals who are not directly involved in the activity or unit being reviewed and who do not report to the immediate supervisor of that activity or unit.” Moreover, in order to facilitate the assessments, the oversight body should build a “management information system” showing the “progress, and results” of oversight operations. The system should generate data that shows “particular deficiencies warranting review,” including failures to follow protocol.

### External Review

The more extensive the powers of an oversight agency, the greater the need for checks against potential abuse. Robust external controls may take the form of judicial review, a statutory inspectorate overseeing the agency, federal and state audit requirements, and legislative oversight. Montréal’s OIG is [overseen by the City Council](#), which reserves the power to remove the inspector general with cause, as well as overturn the OIG’s decision to cancel procurement contracts. The Independent Broad-Based Corruption Commission (IBAC) of Victoria, which boasts powers of summons and surveillance, is subject to checks and balances in the form of a statutory inspectorate and parliamentary oversight.<sup>18</sup>

The AIG recommends that all oversight body “[a]udits, investigations, inspections and reviews [be] subject to quality assurance reviews by an appropriate professional non-partisan objective group every three to five years.” The assessment should result in a public report issued to the oversight body’s appointing authority and/or oversight board.

## Building Publicity and Trust

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One of the most effective methods by which oversight agencies may build public and political support is stimulating high-profile media coverage of corruption and oversight operations. Strong public interest in anti-corruption can elicit support and remove opposition from within the ranks of government.

Public reports and hearings can play a key role in building publicity and trust. Issuing public reports should be a priority for all OIGs. And for Victoria’s IBAC, public hearings on corrupt conduct turned out to be an “[extremely effective and necessary tool](#)” that attracted media attention, raised public support, and broke the government’s complacency regarding corruption.

In some instances, publicity can even attempt to substitute for the absence of enforcement powers. The AIG recommends that oversight bodies release public reports identifying those recommendations issued to overseen entities that have not been implemented. For oversight bodies without formal enforcement powers, “naming and shaming” keeps agencies accountable, assuming that public reports can generate sufficient media publicity. For instance, the Office of Inspector General for the New York Police Department (OIG-NYPD) releases reports about the NYPD on its website, which helps keep the NYPD responsive in implementing the OIG’s recommendations.

#### Case Study:

#### The Independent Broad-Based Corruption Commission (IBAC) of Victoria

From the outset, the Independent Broad-Based Corruption Commission (IBAC) of Victoria encountered widespread cynicism towards its ability to serve as an effective anti-corruption body. Aside from the narrow statutory definition of corrupt conduct, the strict threshold requirements for commencing an investigation posed significant challenges for the fledgling agency. Its lack of basic powers of arrest, search and seizure, and interviewing without summons also constrained the agency.

However, certain tools contributed to early success and gave IBAC the leverage to expand its range of functions and powers. Public hearings on corrupt conduct, in particular, were an “extremely effective and necessary tool” that attracted significant media attention, raised public support, and broke the government’s complacency regarding corruption. According to Alistair Maclean, the Chief Executive Officer of IBAC, “We slowly built political support for amendments to our legislated powers, firstly by demonstrating that whilst we were somewhat effective we were also unreasonably constrained. This culminated in a public report to parliament on our first year of operations, which highlighted the constraints and made a number of recommendations for amendments. These were passed almost in their entirety two years later.”<sup>19</sup>

IBAC lacks powers of enforcement. According to Mr. Maclean, “The initial public sector ‘shock’ at the scale and extent of the corrupt conduct we exposed led to a rush to accept (or be seen to be accepting) IBAC recommendations.” Now in its fifth year of existence, IBAC is steadily encountering resistance from agencies to accepting and implementing recommendations. “Whilst we are yet to do so, there will quite soon be a phase of IBAC reporting publicly on the extent to which agencies have responded (or not responded) to our findings and recommendations, and possibly making further recommendations to parliament about possible legislated responses.”

### Case Study:

#### Office of the Inspector General for the New York Police Department (OIG-NYPD)

Established in 2014 as part of the NYC Department of Investigation, the Office of the Inspector General for the New York Police Department (OIG-NYPD) conducts systemic investigations of police misconduct and submits recommendations on policy and organizational changes to the city's police department. The office was created in the face of considerable opposition from the former mayor, whose veto of the bill ultimately was overridden by the City Council.

Despite its power to issue subpoenas, the OIG does not have the authority to force implementation of its recommendations within the NYPD. The NYPD must respond to an OIG report within ninety days, during which it may choose to implement or partially implement a recommendation. Although it lacks formal enforcement powers, OIG holds the police department accountable by issuing public annual reports evaluating the NYPD's implementation of recommendations, which have generated considerable publicity. According to Phil Eure, the Inspector General for the NYPD, exposure through public reports is where the office "gets its teeth."

## Protection for Whistleblowers and Witnesses

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For many oversight agencies, whistleblowers are a key source of reports about fraud and corruption. In the United States, federal, state, and local governments have recognized the importance of protecting whistleblowers by passing numerous statutes prohibiting workplace retaliation against individuals who report misconduct to the government.

Oversight agencies must take special care to protect the identities of whistleblowers and witnesses in investigations. Doing so strengthens the oversight body's credibility with potential whistleblowers and witnesses. The AIG recommends that the statute establishing the oversight body "provide protections to complainants who, as a result of their complaints to the OIG, might be subject to retaliation by their employers." Moreover, the statute should "authorize the OIG to maintain appropriate confidentiality of records and, to the extent practicable, of the identities of individuals who provide information to the OIG, unless it is necessary to make such records or identities public in the performance of his/her duties." Oversight bodies should develop specific protocols for safeguarding the identity of confidential sources and disclosing records to the public.

## Reporting Requirements

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[Statutory reporting requirements encourage the reporting of misconduct](#), which can ease the oversight agency's investigative burden. The AIG recommends that the establishing statute grant the oversight agency the authority to require all public employees to report information on fraud and corruption to the oversight agency. The state of New York, for example, requires "[\[e\]very state officer . . . \[to\] report promptly to the state inspector general any information concerning corruption, fraud. . . relating to his or her office or employment.](#)" Moreover, New York law punishes the knowing failure to report misconduct by terminating the government official's employment. Similarly, New York City [requires City employees to report](#) any suspected corruption to the DOI.

## Cross-Agency Coordination

Maintaining alliances with government entities can often be a challenge for oversight agencies. Nevertheless, some level of coordination with other agencies is essential to carrying out efficient operations and preventing the waste of resources. In particular, oversight agencies should coordinate with groups that have performed or are performing independent evaluations of programs and activities under the oversight agency’s purview. The oversight body may also work with other organizations in conducting joint “reviews, audits, inspections, or investigations.” These agencies might be in the same level of government, i.e. another city agency, or might be an agency on the state or even federal level. For ideas about resources that other agencies may possess that may be helpful to an oversight agency’s investigation, see CAPI’s practitioner toolkit [The Resources of New York’s Public Integrity Agencies: Putting Them to Work for You](#). And for ideas about working together across levels of Government, see CAPI issue brief [Strategies for Increasing and Improving Public Corruption Prosecutions: The Task Force Model](#).

### Endnotes

- <sup>1</sup> For expert advice on important qualities in an Inspector General, see CAPI issue brief [Seven Principles of Highly Effective Inspectors General](#).
- <sup>2</sup> See, e.g., JOSEPH DE ANGELIS ET AL., CIVILIAN OVERSIGHT OF LAW ENFORCEMENT: ASSESSING THE EVIDENCE 36 (2016); JON QUAH, TRANSPARENCY INT’L, ANTI-CORRUPTION AGENCIES STRENGTHENING INITIATIVE: RESEARCH IMPLEMENTATION GUIDE 8 (2015).
- <sup>3</sup> DE ANGELIS ET AL.; QUAH; Interview with a Former Inspector General, Columbia University (July 2017).
- <sup>4</sup> See, e.g., DE ANGELIS ET AL.; QUAH,
- <sup>5</sup> QUAH.
- <sup>6</sup> Interview with a Former Inspector General.
- <sup>7</sup> PRINCIPLES AND STANDARDS. Louisiana’s current State Inspector General Stephen Street has faced multiple budget cuts and has seen his office shrink from seventeen to thirteen positions over the last two budget cycles, purportedly due to opposition from state legislators. See Elizabeth Crisp, *Inspectors General: Funding, Access Create Hurdles for Corruption Investigations in Louisiana*, ADVOCATE (Jan. 30, 2017, 5:00 PM), [http://www.theadvocate.com/baton\\_rouge/news/politics/article\\_c4af4ae0-e727-11e6-a955-cbdc5ef0c2e3.html](http://www.theadvocate.com/baton_rouge/news/politics/article_c4af4ae0-e727-11e6-a955-cbdc5ef0c2e3.html). According to Street, “I have now learned that if you do this job right, then there will be folks that are going to come after you and it’s going to happen regularly.” *Id.*; Andy Shaw, *City Council Factions Prepare for Inspector General Showdown*, BGA (Jan. 10, 2016 5:00PM), <http://www.bettergov.org/news/city-council-factions-prepare-for-inspector-general-showdown>. See also CAPI publication: *Independent Inspectors General Under Siege: A Tale of Two State Inspectors General*. Available [here](#).
- <sup>8</sup> Denis Gallant, Presentation at CAPI Global Cities II conference (June 8, 2017).
- <sup>9</sup> CAPI Global Cities II Oversight Breakout Session (June 8, 2017).
- <sup>10</sup> QUAH.
- <sup>11</sup> Denis Gallant. The Montreal Inspector General serves a single five-year term. See [Quebec National Assembly Bill 1, 2014](#).
- <sup>12</sup> DE ANGELIS ET AL.
- <sup>13</sup> Denis Gallant, *supra* note 18.
- <sup>14</sup> Oversight Breakout Session.
- <sup>15</sup> Oversight Breakout Session.
- <sup>16</sup> DE ANGELIS ET AL.
- <sup>17</sup> QUAH.
- <sup>18</sup> Written interview with Alistair Maclean, Chief Executive Officer of the Independent Broad-based Anti-Corruption Commission of Victoria, Australia, July 2017.
- <sup>19</sup> Written interview with Alistair Maclean.