



# Annual Report

Office of Inspector General  
of Ville de Montréal

2021  
2021  
2021



FROM JANUARY 1 TO DECEMBER 31, 2021

Trust

Integrity

Transparency



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# Mot de l'inspectrice générale

# Mot de l'inspectrice générale



L'adage veut que derrière chaque défi se cache toujours une opportunité. Placée sous le signe d'une éreintante nécessité de résilience, l'année 2021 n'y fait pas exception alors qu'elle a permis à nos équipes de faire valoir l'étendue de leurs aptitudes à innover et à se renouveler. Valeurs clés du succès de toute organisation, je suis fière de constater qu'elles animent tous les membres du Bureau de l'inspecteur général, le présent rapport en étant la preuve première.

D'entrée de jeu, il est à souligner que la dernière année a été marquée par l'atteinte du cap de la 1000<sup>e</sup> dénonciation analysée par le Bureau depuis sa fondation en 2014. Quoique les signalements de nos lanceurs d'alerte constituent toujours le socle indispensable à notre efficacité, nos travaux de vigie et de surveillance sur les chantiers démontrent à nouveau cette année la grande capacité d'adaptation de nos équipes dans leur rôle de chien de garde de l'intégrité des processus de passation et d'exécution des contrats à la Ville de Montréal.

Ainsi, ont fait l'objet d'inspections, d'analyse documentaire et de rencontre de témoins des projets aussi variés que la gestion des débris de démolition, l'aménagement des parcs et la rénovation des logements de l'Office municipal de l'habitation de Montréal. Nous avons également publié un rapport de fond sur la conformité légale des pratiques de la Société de transport de Montréal en matière de modifications contractuelles.

Le chantier de l'intégrité contractuelle demeure toujours une œuvre inachevée. À force de rapports publics levant le voile sur différents stratagèmes dolosifs, nous observons encore cette année que certains n'hésitent pas à revenir à la charge en tant qu'échafauder d'autres ruses plus subtiles et raffinées. Nous ne pouvons donc pas nous permettre de baisser la garde, d'autant plus que la Ville de Montréal constitue le deuxième plus gros donneur d'ouvrage au Québec.

À cet effet, notre équipe de formation et de prévention est constamment à pied d'œuvre afin d'alimenter et de renouveler leurs présentations à la faveur des apprentissages de nos plus récents rapports. Tout comme nos bulletins de prévention, ces séances de formation sont taillées sur mesure et adaptées à la réalité concrète de la Ville de Montréal et de ses sociétés liées. Signe indéniable de son succès, le programme de formation du Bureau a dépassé en 2021 le cap des 10000 participations.

La collusion, la corruption, les manœuvres dolosives et autres actes de délinquance contractuelle ont généralement cours dans la pénombre, à l'abri des regards indiscrets. Le nerf de la guerre contre ces malversations demeure donc une collecte, une organisation et une transmission efficace et efficiente de l'information. À ce titre, je me dois de souligner la précieuse contribution de nos organisations partenaires qui, par la voie du comité de coordination que nous avons mis sur pied en 2018, a mené au développement d'initiatives prometteuses pour nos équipes d'analyses, d'enquête, de formation et juridique.

En guise de conclusion, j'aimerais remercier l'ensemble des membres de notre Bureau. À tous les jours, ils parviennent à trouver des nouvelles façons de mettre au profit des contribuables montréalais leurs expériences professionnelles riches et diversifiées, plusieurs ayant d'ailleurs connu une première carrière dans des domaines aussi variés que la police, le droit, le génie, les technologies de l'information et l'enseignement. C'est leur dévouement indéfectible à rendre exemplaires les pratiques en matière contractuelle à la Ville de Montréal qui fait du Bureau de l'inspecteur général un chef de file dans le monde de la lutte contre la corruption et pour l'intégrité.

L'inspectrice générale,

M<sup>e</sup> Brigitte Bishop

ORIGINAL SIGNÉ



# Message from the inspector general

# Message from the Inspector General



As they say, with every challenge comes an opportunity. Never was this truer than in 2021, a year that required gruelling resilience, yet also allowed our teams to demonstrate the extent of their abilities to innovate and adapt. These are key values for any organization and I'm proud to see them reflected in our Office of Inspector General members, as demonstrated in this report.

First and foremost, it should be noted that this past year, the OIG reached a major milestone as it reviewed its 1,000<sup>th</sup> denunciation since its foundation in 2014. Although whistleblower reports remain our biggest source of information, our on-site monitoring and surveillance work has once again been a testament to our team's enormous adaptation abilities as they carry out their role as a watchdog over the integrity of contract award and performance at Ville de Montréal.

As such, a variety of projects – such as demolition debris management, parks development, and the Office municipal de l'habitation de Montréal housing renovations – have been subject to inspections, document reviews and witness interviews. We also published a background report on the legal compliance of the Société de transport de Montréal's practices with respect to contractual amendments.

Work on contract integrity is still ongoing. As evidenced by the various fraud strategies uncovered by public reports, new, more subtle and sophisticated tricks crop up every year. As such, we cannot afford to let our guard down, especially since Ville de Montréal is the second-largest provider of work in Quebec.

Our training and prevention team is working tirelessly to add to and update their presentations based on what they learn from our most recent reports. Like our prevention newsletters, these training sessions are tailored and adapted to the concrete reality of Ville de Montréal and its related organizations. As a clear sign of its success, the Office's training program surpassed the 10,000-participant mark in 2021.

Collusion, corruption, fraud and other acts of contractual delinquency generally occur in the shadows, behind closed doors. Our ultimate weapon against these wrongdoings remains the effective and efficient collection, organization and transmission of information. As such, I must acknowledge the valuable contribution of our partner organizations, which, through the coordination committee we established in 2018, led to the development of promising initiatives for our analysis, investigation, training and legal teams.

In closing, I would like to thank all the members of our Office. Every day, they find new ways to use their rich and diverse professional experiences to benefit Montréal taxpayers, as many of them have had previous careers in fields as diverse as law enforcement, law, engineering, IT and education. Their unwavering dedication to upholding exemplary contracting practices at Ville de Montréal has made the Office of the Inspector General a leader in the world of anti-corruption and integrity.

The Inspector General,

Brigitte Bishop

ORIGINAL SIGNED

# Table of contents

## Office of Inspector General

Mandate _____	9
Jurisdiction _____	9
Powers _____	11
Guarantees of independence _____	12
Protection of whistleblowers _____	12
Denunciation Hotline _____	14
Standing Committee on the Inspector General (SCIG) _____	14

## Our organization

Office of Inspector General's Management Team _____	17
The Team _____	18
2021 by the numbers _____	20
Whistleblowing statistics _____	21
Mandate given under the <i>Act Respecting the Autorité des marchés publics</i> _____	27

## Analysis and preliminary investigations

Files closed during preliminary investigation and corrective actions taken after intervention _____	29
Monitoring _____	31

## Inspections and investigations

Highlights _____	34
Investigations completed in 2021 _____	34
Public report released in 2021 _____	35
Work site monitoring _____	36
Follow-up on reports from previous years _____	38

## Prevention and training

Prevention activities _____	41
The training program _____	42

## Our human and financial resources

Social engagement _____	45
Outreach _____	45
Budget and accountability _____	46
Equal access to employment _____	47



# Office of Inspector General

- » Mandate
- » Jurisdiction
- » Powers
- » Guarantees of independence
- » Protection of whistleblowers
- » Denunciation Hotline
- » Standing Committee on the Inspector General (SCIG)

# Office of Inspector General

## Mandate

According to the *Charter of Ville de Montréal, metropolis of Québec*, the Inspector General's mandate is to oversee contracting processes and the carrying out of contracts by Ville de Montréal or by a legal person covered in the Act.<sup>1</sup>

The Inspector General **recommends** to City Council:

- » Any measures aimed at preventing a breach of integrity in contracting by the City or the performance of such contracts
- » Any measures designed to foster compliance with the applicable legal provisions and the City's requirements regarding contracting or the performance of contracts

In addition, the Inspector General **verifies**, within the City, the implementation of such measures adopted by any council.

The Inspector General is also responsible for **training** council members, as well as city employees, so that they can recognize and prevent any breach of integrity or violation of the applicable rules concerning contracting by the City or contract performance.

The Inspector General's mandate applies to both contracts that fall under the jurisdiction of agglomerations and those under a local power. For Ville de Montréal, the Inspector General has jurisdiction over all the contracts awarded by City Council, the Agglomeration Council and each borough. However, the Inspector General does not have jurisdiction over contracts awarded by the reconstituted municipalities.

## Jurisdiction

The Inspector General has jurisdiction over:

- » Ville de Montréal
- » City employees
- » Elected officials and members of their offices
- » Selection committee members
- » Legal persons associated with the City
- » People in a contractual relationship with the City and subcontractors

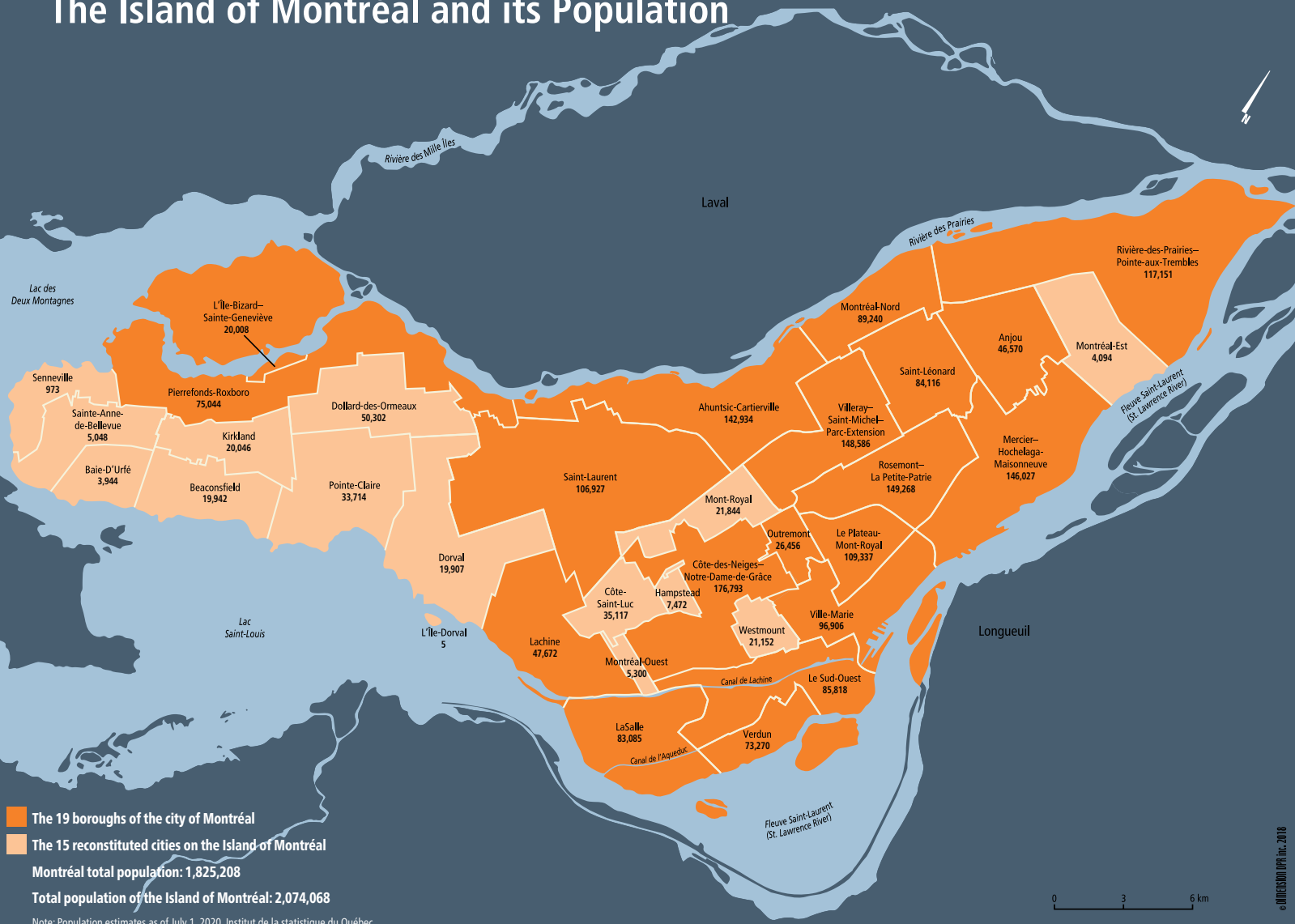
The Inspector General has jurisdiction over all the contracts awarded by these entities, regardless of the amount, procurement method and nature.

The legal persons associated with the City include:

- » Société de transport de Montréal
- » Société d'habitation et de développement de Montréal
- » Société du parc Jean-Drapeau
- » Agence de mobilité durable
- » Office municipal d'habitation de Montréal

<sup>1</sup> The legal persons involved are indicated in subparagraph 1 of the fifth paragraph of section 57.1.9.

# The Island of Montréal and its Population



While overseeing contract award and performance at Ville de Montréal, the Inspector General carries out her mission in accordance with three fundamental values:

**TRUST:** Preserve the public's trust in municipal public institutions with respect to contracting.

## Powers

The powers that legislator have conferred on the Inspector General can be found in sections 57.1.9, 57.1.10 and 57.1.23 of the *Charter of Ville de Montréal, metropolis of Québec*.

### Power to require information and documents

The Inspector General is entitled to examine any books, registers or records or to obtain any information relevant to her mandate.

### Inspection power

The Inspector General may, at all reasonable times, enter a building to examine any books, registers or records. The Inspector General may require the owner, occupant or any other person on the premises being visited to give her reasonable assistance.

The Inspector General may also use any computers, equipment or any other items found on the premises being visited to access data relevant to her mandate or to inspect, examine, process, copy or print out such data.

**INTEGRITY:** Ensure the integrity of the contracting process.

**TRANSPARENCY:** Improve the transparency of municipal activities and decisions by bringing certain situations to light and formulating various recommendations and courses of action.

### Power to cancel, rescind and suspend

The Inspector General may cancel any contracting process involving a contract from the City or any related legal person, or rescind or suspend the performance of such a contract when the following two conditions are met:

- » if the Inspector General finds that any of the requirements specified in a document of a call for tenders or a contract have not been met or that the information provided in the contracting process is false and
- » if she is of the opinion that the seriousness of the breach observed justifies the cancellation, rescinding or suspension

### Power to make recommendations

The Inspector General may, at any time, send the council or any city body any report presenting findings or recommendations that, in her opinion, warrant being brought to its attention.

## Delegation of powers

All the Office of Inspector General members involved in the investigations have been delegated powers by the Inspector General under section 57.1.19 of the *Charter of Ville de Montréal, metropolis of Québec*.

Therefore, they can meet with or contact employees, elected officials, members of selection committees or boards of directors, bidders, and anyone who is bound by contract to the City and any legal person associated with it.

Only the Acting Deputy Inspector General holds a delegation of powers to cancel a call for tenders, rescind a contract or suspend the carrying out of a contract under section 57.1.19 of the *Charter of Ville de Montréal, metropolis of Québec*.

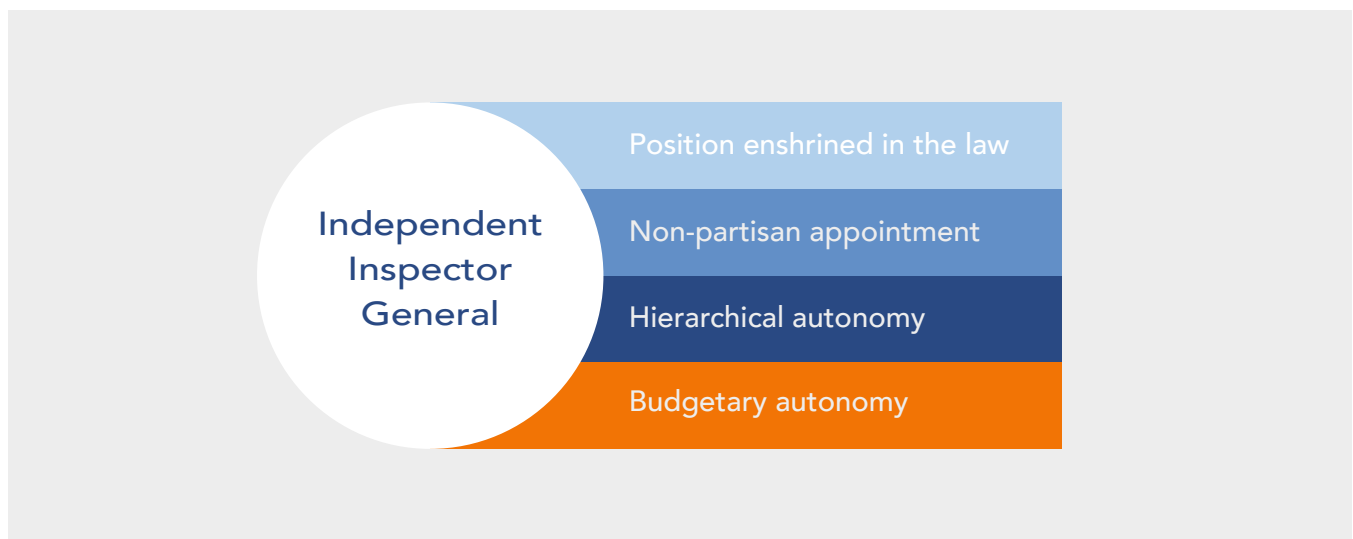
## Guarantees of independence

Several guarantees of independence are provided to the Inspector General under the *Charter of Ville de Montréal, metropolis of Québec*.

The office of Inspector General cannot be abolished based on the political will of the municipal administration in power. A two-thirds majority vote of City Council is required to appoint, dismiss or suspend the Inspector General.

Neither the Mayor nor the City Manager has authority over the Inspector General. She reports directly to City Council. Furthermore, there is no relationship of subordination between the City Council and the Inspector General.

The Inspector General's appointment is protected for a non-renewable term of five years. Her budget is set by law, at a fixed percentage (0.11%) of the Ville de Montréal operating budget. The Office of Inspector General cannot be subjected to budget cuts that could affect its activities and operations.



## Protection of whistleblowers

The Inspector General has the duty and obligation to take all necessary measures to protect the anonymity of anyone who provides information or exposes a situation (Section 57.1.14 of the *Charter of Ville de Montréal, metropolis of Québec*).

*An Act Respecting the Inspector General of Ville de Montréal* emphasizes the importance of protecting whistleblowers. It is particularly thanks to the courage of people who denounce situations that the Office of Inspector General can initiate investigations. These individuals must be able to do so with the assurance that their anonymity will be preserved at all stages of handling a disclosure or legal proceedings following the release of a public report.

Internal written procedures ensure that when witnesses are met, during discussions with project owners or in the publication of public reports, the Inspector General takes the necessary steps to preserve the anonymity of whistleblowers who disclosed information and helped move the investigation forward.

## At the provincial level

The work and subsequent recommendations of the Commission of Inquiry on the Awarding and Management of Public Contracts in the Construction Industry have shown the importance of:

- » Facilitating the disclosure of wrongdoing committed or about to be committed against public bodies
- » Providing protection for whistleblowers
- » Prohibiting any form of reprisal or threats to prevent disclosure or a person's participation in an investigation

This led to the adoption on May 1, 2017, at the provincial level, of the *Act to Facilitate the Disclosure of Wrongdoings Relating to Public Bodies* (CQLR, c D-11.1).

Section 57.1.15 of the *Charter of Ville de Montréal, metropolis of Québec* prohibits any reprisals and threats against whistleblowers and provides for heavy fines if these rules are violated.

The following actions are deemed to constitute reprisals:

- » Demotion
- » Suspension
- » Termination of employment
- » Transfer
- » Any disciplinary or other measure that adversely affects employment or working conditions

Fines applicable in the event of reprisals:

- » \$2,000 to \$20,000 for an individual
- » \$10,000 to \$250,000 in other cases

For any subsequent offence, the amounts are doubled.

### High standards

The Office of Inspector General handles all denunciations it receives in a confidential, objective and impartial manner.

The Inspector General endeavours to produce high-quality reports that are timely, objective and accurate and that are presented in such a way as to enable the individuals and organizations over which she has jurisdiction to take action on the basis of the information they contain.

The Inspector General sets as burden of proof in her public reports the standard of a preponderance of evidence, namely the civil norm of reasonable degree of probability.

## Independence

The Inspector General carries out her work in a fully independent manner. Nothing and no one can influence her investigations, decisions, opinions and recommendation reports. They are objective, impartial and free from conflict of interest.

This independence is both fundamental and essential to the role of Inspector General. Independence, in appearance and in fact, must be ensured through protection, autonomy and freedom of action.

## Denunciation Hotline

### Whistleblowing: a key factor

The denunciation hotline attests to the importance given to the key role played by whistleblowers. It involves elected officials, City employees and suppliers, as well as citizens in their monitoring role to preserve the integrity of the contracting process, as well as the ethics and rules that fall under the mandate of other departments or organizations such as the Ville de Montréal Comptroller General, the Commission de la fonction publique de Montréal and the Ombudsman.

### Protecting the identity of whistleblowers

A hotline was set up soon after the Office of Inspector General was created, while its website has an encrypted online form for the secure disclosure of information.

Any person may communicate information to the Inspector General that is relevant to the fulfillment of her mandate.

A person who communicates information to the Inspector General may do so notwithstanding:

- » the *Act respecting access to documents held by public bodies and the protection of personal information*
- » the *Act respecting the protection of personal information in the private sector*
- » any other communication restrictions under other laws of Québec
- » any duty of loyalty or confidentiality that may be binding on the person, in particular with respect to an employer or client (with the exception, however, of information on a person's health and information protected by professional secrecy between attorneys or notaries and their clients)

The Office receives a large number of denunciations, some of which are outside its mandate. These are forwarded to the entities concerned, with the whistleblower's authorization. In cases where investigative or verification bodies require that denunciations be made directly to them by the whistleblowers, the Office asks them to contact those entities directly.

### A single window since 2014

When the first Inspector General was appointed, one of the priorities was to set up a denunciation hotline.

In accordance with the municipal administration's desire to transfer the ethics hotline to an independent entity reporting to City Council, the Office of Inspector General was given the mandate to manage the City's ethics hotline, which the Comptroller General had been in

charge of since 2010. The Office therefore receives denunciations from that line and transfers them to the Comptroller General, who investigates them.

The merger of these two lines makes it possible to report irregularities and wrongdoings for a wide range of problematic situations.

## Standing Committee on the Inspector General (SCIG)

The *By-law on the Standing Committee on the Inspector General* was passed on March 24, 2014 (CM14 0262).

Like all the City's standing committees, the SCIG's mission is to inform elected municipal officials in the decisions they make.

The Standing Committee cannot at any time intervene in the investigations of the Office of Inspector General due to its complete independence.

*The purpose of the SCIG is to review any issues relating to the Inspector General's mandate and to make such recommendations to City Council as it deems appropriate. It performs this function at the request of City Council or the Executive Committee or on its own initiative (Section 2 of RCG 14-014).*

In fact, when a public report from the Office of Inspector General is filed with authorities, City Council forwards it to the SCIG for review and to obtain its opinion on the recommendations made by the Inspector General.

*A review of each item on the agenda of a working session of the SCIG may include a presentation by the Inspector General, the City's authorized representatives, or any other person authorized by the chair of the working session. For instance, the Chair may, for the purpose of reviewing an item on the agenda, ask experts or people recognized as having relevant experience to make a presentation to the SCIG (Section 18 of RCG 14-014).*

The SCIG's recommendations report is submitted to City Council and, as applicable, to the Agglomeration Council. The Executive Committee is responsible for accepting or rejecting the recommendations.



# Our organization

- » Office of Inspector General's Management Team
- » The Team
- » 2021 by the numbers
- » Whistleblowing statistics
- » Mandate given under the *Act Respecting the Autorité des marchés publics*

# Our organization

## Office of Inspector General's Management Team



### INSPECTOR GENERALE

#### Brigitte Bishop

Member of the Québec Bar since 1989.

Crown prosecutor for 27 years.

Appointed Inspector General of Ville de Montréal on December 17, 2018, for a term of five years, Ms. Bishop previously held the position of Acting Deputy Inspector General since April 2017.

Member of the Board of Directors of the American Association of Inspectors General (AIG) since 2020.



### ACTING DEPUTY INSPECTOR GENERAL

#### Suzanne Corbeil

Member of the Québec Bar since 1983.

Lawyer with over 35 years of experience in municipal law.

Acting Deputy Inspector General since February 2021.



### DEPUTY INSPECTOR GENERAL - ANALYSIS AND PRELIMINARY INVESTIGATIONS

#### Freddy Foley

Bachelor's degree in Business Administration.

Police officer and manager at Sûreté du Québec for 32 years.

Deputy Inspector General – Analysis and Preliminary Investigations since October 2018, but on an interim basis since October 2016. Previously in charge of inspections and investigations beginning in September 2014.



### DEPUTY INSPECTOR GENERAL - INSPECTIONS AND INVESTIGATIONS

#### Michel Forget

A graduate of Université du Québec à Trois-Rivières and the FBI's National Academy in Quantico.

Police officer and manager at Sûreté du Québec for 27 years.

Deputy Inspector General – Inspections and Investigations since November 2016. Previously Inspection and Investigation Officer since June 2015.



### DEPUTY INSPECTOR GENERAL - PREVENTION, TRAINING AND ANALYSIS

#### Dean Gauthier

Certified supply chain management professional.

Over 35 years of experience in supply chain and procurement.

Deputy Inspector General since fall 2021, previously Director of Procurement for Ville de Montréal for four years.

## The Team

The Office of Inspector General of Ville de Montréal relies on four teams working together to ensure its proper operation. They help to optimize the process of handling denunciations and complete investigations with a focus on efficiency, integrity and professionalism. The teams also work to publicize the consequences of fraudulent practices by publishing recommendation reports, decisions and information bulletins. A team from the Office is also responsible for training project owners, elected officials and employees from municipal and other related organizations on proper contracting procedures in order to prevent irregularities and detect suspicious practices.

### Analysis and Preliminary Investigations team

The primary role of this team is to receive denunciations, review them, keep relevant information and build cases. The team carries out the initial validation steps and takes action, where possible, before contracts are awarded, to avoid problematic situations or correct any deficiencies in the contracting process. Its commitment is an important asset for Ville de Montréal in terms of maintaining contractual integrity.

In 2021, the team was made up of Deputy Inspector General Freddy Foley and Research Officers Antoinette Khabbaz, Valérie Meehan, Alexandre Pelletier-Chevrier and Marie Vanbreemersch.

### Inspection and Investigation team

The more complex cases that require complementarity between research and the investigation process are sent to the Inspections and Investigations team, which monitors, inspects, conducts verifications and interviews and gathers relevant documentation. This field work allows the team to corroborate the information collected and issue findings and conclusions on contractual breaches observed.

The team is made up of Deputy Inspector General Michel Forget and Inspections and Investigations Officers Nancy Boulerice, Félix D'Amours, Marianne Dorlot, Michel Hamelin, Glenn Lapointe, Luc Lamy, Robert Lebrun, Éric Parent, Marco Roy, Marie-Claude Touchette and Serge Vandal.

### Legal Affairs team

Acting Deputy Inspector General Suzanne Corbeil, Guillaume Crête and Simon Laliberté form the Legal Affairs team. It is responsible for validating the legal aspects of Office of Inspector General interventions and reports.

### Prevention, Training and Analysis team

As its name suggests, this team is responsible for the training component of the Inspector General's mandate and it offers preventive interventions to project owners and their employees, as well as to partners and other interested organizations. The team is made up of Deputy Inspector General Dean Gauthier, Procurement Advisor Benjamin Charruyer, Research Officer Julie Lefebvre and Office Agent Ioana Pescarasu.

### Team directed by the Inspector General

The team directed by Inspector General Brigitte Bishop includes Communications Officer Linda Boutin, Administrative Support Officer Anick Chartrand, and Executive Secretary Chantal Poirier.

### All the best in retirement!

Five esteemed colleagues retired in 2021: Deputy Inspector General Pierre Egesborg, Office Agent Jacqueline Gadouas, Executive Secretary Sandra Hébert, Analysis and Management Control Advisor Manon Lortie and Chartered Professional Accountant Céline Plamondon. The Inspector General applauds their commitment and contribution to the Office's reputation for excellence.

### A seasoned team

The people who work in the Office of Inspector General come from a variety of backgrounds. The majority have a long professional track record which, combined with their colleagues' years of experience, confirms the Office's solid contract management expertise.

Sector	Number of people who work or have worked in this sector	Total years of experience
Procurement	4	56
Communications	4	42
Law	5	87
Training	3	26
Administrative and police investigations	14	240
Engineering	3	52
Administrative management	11	132
Contract management	2	8
Research and analysis	7	121
Information technology	1	25

# 2021 by the numbers

Authorized human  
resources:

**31**

Budget resources  
used:

**\$4.2 M**

## Activities

**313**

denunciations received

**413**

witnesses interviewed or contacted

**121**

files opened

**56**

surveillance operations

**172**

files closed

**374**

voluntary remittances

**39**

denunciations followed by intervention  
during a call for tenders

## Training program

**1,736**

participants

**112**

training sessions

## Publications

**2**

prevention newsletters

**1**

report on various contracts awarded  
to 11073192 Canada Inc. and the  
involvement in the award to and  
performance of these contracts by a  
person ineligible for public contracts

**1**

annual report

**1**

mid-year report

## Whistleblowing statistics

From January 1 to December 31, 2021, the Office of Inspector General received 313 denunciations, compared with 474 in 2020 and 296 in 2019.

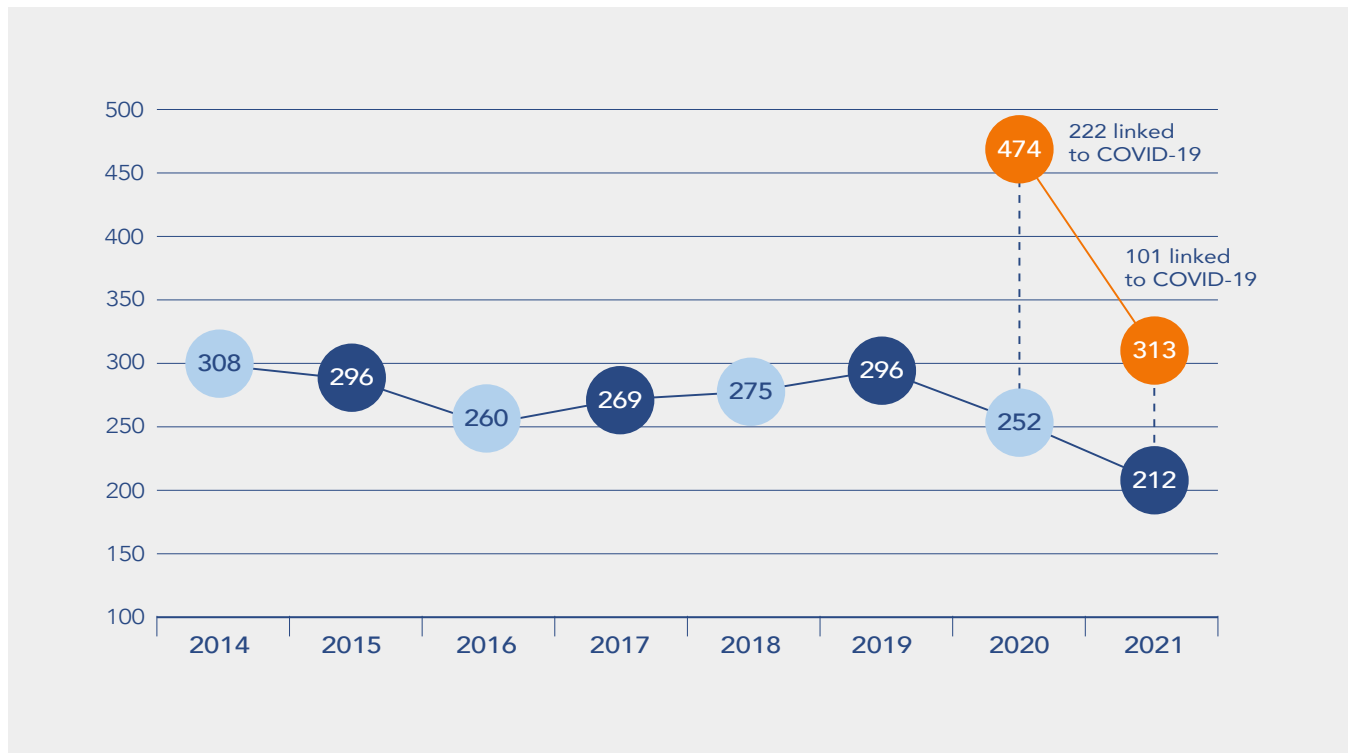
Of the 313 denunciations received, 101 are related to COVID-19 and non-compliance with pandemic prevention measures, 65% less than the 222 denunciations in 2020. Most of these denunciations were received in the first half of 2021.

Each citizen who left their contact information was called back to gain a better understanding of the nature of their denunciation. Depending on the case, some were invited to contact the Service de police de la Ville de Montréal to report problematic situations. Others who had questions or were looking for information about COVID-19 were directed to citizen services on government sites.

So as not to alter the data comparisons, it was decided for the second year in a row not to count the 101 COVID-related denunciations in our statistics. As a result, the Office received 212 denunciations related to its mandate in 2021.

The change in the number of denunciations received annually since the creation of the Office of Inspector General is illustrated in the chart below. The graph shows the large number of denunciations following the inception of the Office in 2014, followed by a drop in 2016 and an increase in 2017, with a decrease in the last two years presumably because of the pandemic.

### NUMBER OF DENUNCIATIONS RECEIVED SINCE THE OFFICE WAS CREATED ON FEBRUARY 24, 2014



### Denunciation sources and reporting methods

The next two graphs present detailed statistics on the sources and reporting methods of the 212 denunciations received in 2021. There is a progression in terms of the source and reporting method:

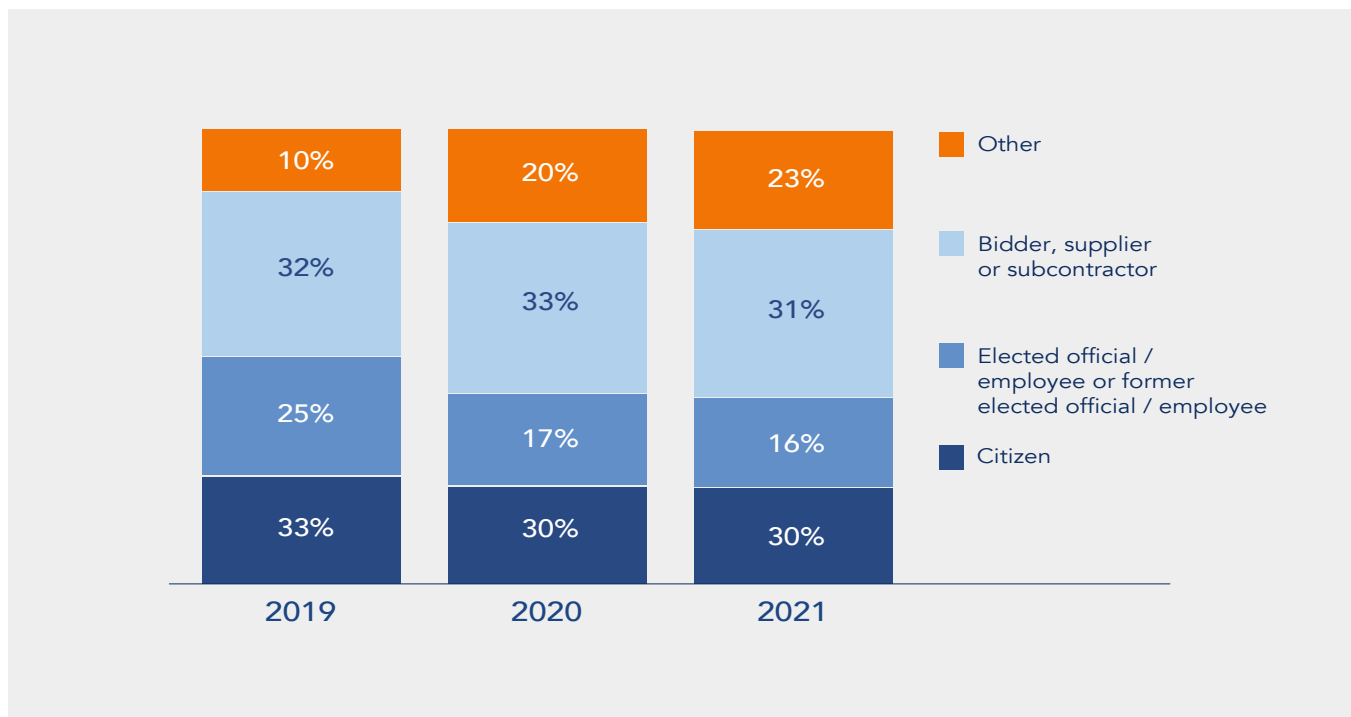
- » The percentage of denunciations received from suppliers and citizens has remained stable in recent years.
- » After dropping in 2019, the percentage of denunciations from public servants has stabilized over the past two years. The percentages went from 25% in 2019 to 17% in 2020 to 16% in 2021.
- » The "Other" section contains files undertaken by the Office of Inspector General. There is an upward trend, from 10% in 2019 to 20% in 2020 to 23% in 2021.

The decrease in whistleblowing by City staff may be partly due to telework, which prevents frequent interactions, one-off exchanges and informal discussions among the various people involved in contract files. This new professional reality allows for fewer opportunities to observe problematic situations, thus reducing the number of denunciations.

The relationship of trust established during work site visits, the interventions of the Office of Inspector General and the training provided have undoubtedly encouraged the use of the denunciation hotline.

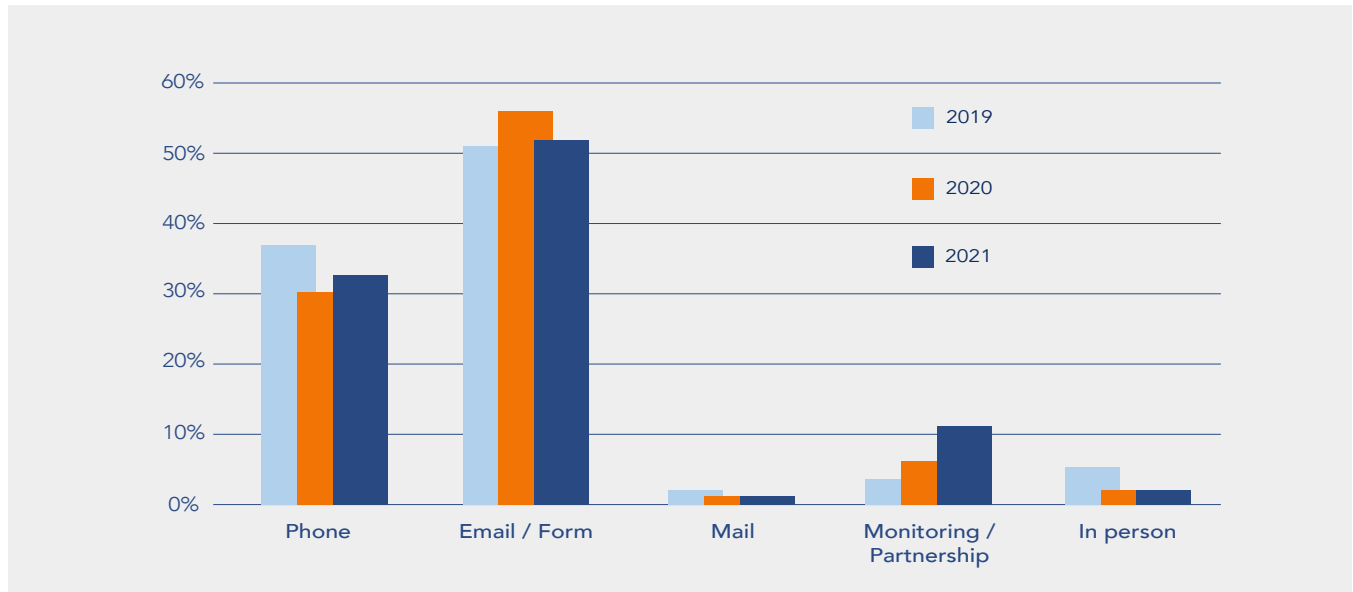
The Inspector General commends the vigilance of these whistleblowers and encourages them to continue alerting the Office of Inspector General of problematic situations they witness. She also invites anyone who witnesses a breach in the contractual management of a Ville de Montréal project to report it using the denunciation hotline.

### MAIN SOURCES OF DENUNCIATIONS



The preferred method for receiving denunciations is by electronic communication (email and form), followed by telephone communication. These two methods were used for almost 86% of the denunciations received in 2021.

### REPORTING METHODS

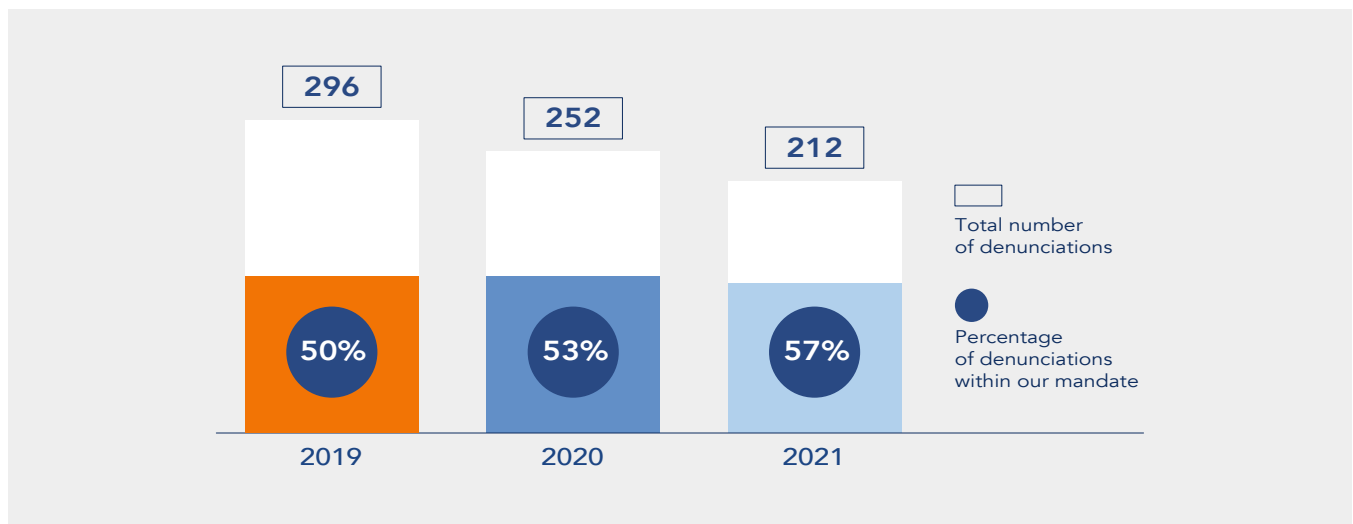


### Denunciations within the mandate of the Inspector General and outside the mandate

Each denunciation that is received is reviewed to determine whether it falls within the Inspector General’s mandate and jurisdiction. For cases that are outside the Inspector General’s mandate, denunciations related to the City’s ethics line must be identified for appropriate handling. Note that the Office of Inspector General manages this line in order to maintain a single point of contact for whistleblowers.

The following chart shows the evolution of the proportion of denunciations falling under its mandate and jurisdiction. Since 2019, the percentage of denunciations within the mandate of the Office of Inspector General has increased slightly. It increased from 50% in 2019 to 57% in 2021.

### PERCENTAGE OF DENUNCIATIONS WITHIN OUR MANDATE VERSUS THE TOTAL NUMBER



When a denunciation does not fall within the Inspector General's mandate or jurisdiction, it is forwarded, with the consent of the person who submitted it, to the entity concerned. Occasionally, the whistleblower is invited to speak directly to the entity, either because the entity does not accept intermediaries or transfers or to allow the person to more fully explain the issue being reported.

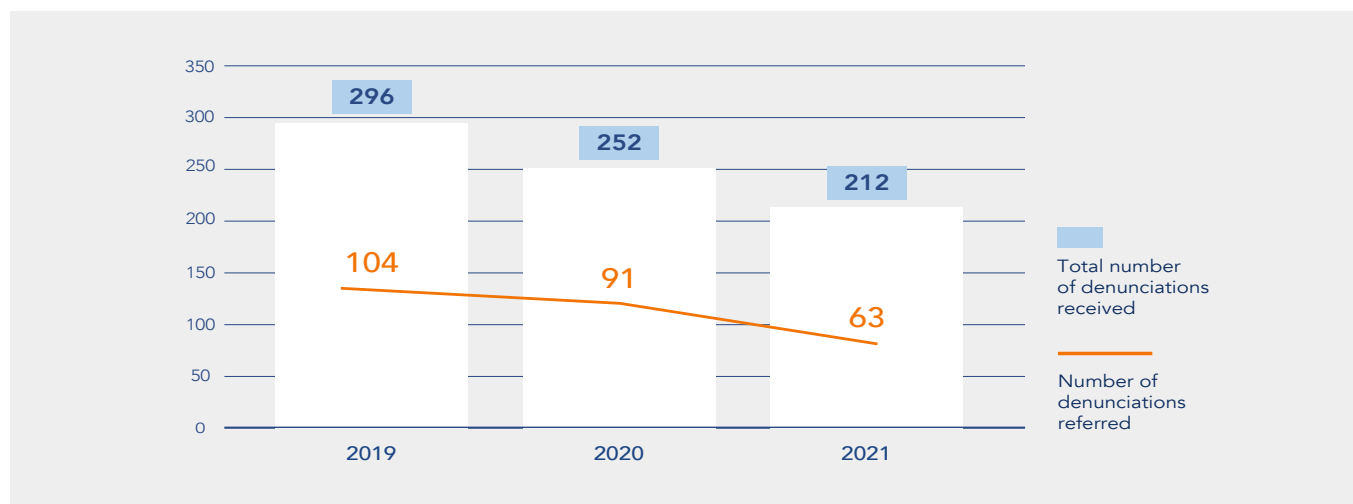
In 2021, 91 of the 212 denunciations received were considered to be outside our mandate. Of these, 63 disclosures were referred

to another entity. The rest did not require any intervention on our part, but were used to feed our database of information. The percentage of denunciations referred in 2021 was 30%, lower than in 2020, when it was 36%.

The following graph and table show the number of referred denunciations out of the total number received, as well as the breakdown of the denunciations referred to other entities.

Note that the data include cases where the person was asked to contact another department or organization directly.

## NUMBER OF DENUNCIATIONS REFERRED



## DISTRIBUTION OF DENUNCIATIONS REFERRED TO ANOTHER BODY<sup>2</sup>

	2019		2020		2021	
	Count	Percentage	Count	Percentage	Count	Percentage
CG	38	36%	28	31%	10	16%
311	29	28%	26	29%	10	16%
SPVM / UPAC	5	5%	8	9%	11	17%
OMBUDSMAN	6	6%	4	4%	4	6%
CFPM	6	6%	1	1%	0	0%
OAG	0	0%	1	1%	3	5%
OTHER	20	19%	23	25%	25	40%
<b>TOTAL</b>	<b>104</b>	<b>100%</b>	<b>91</b>	<b>100%</b>	<b>63</b>	<b>100%</b>

<sup>2</sup> CG: Comptroller General  
311: Ville de Montréal phone line  
SPVM: Service de police de la Ville de Montréal

UPAC: Unité permanente anticorruption  
Ombudsman: Montréal ombudsman  
CFPM: Commission de la fonction publique de Montréal

OAG: Office of Auditor General  
of Ville de Montréal

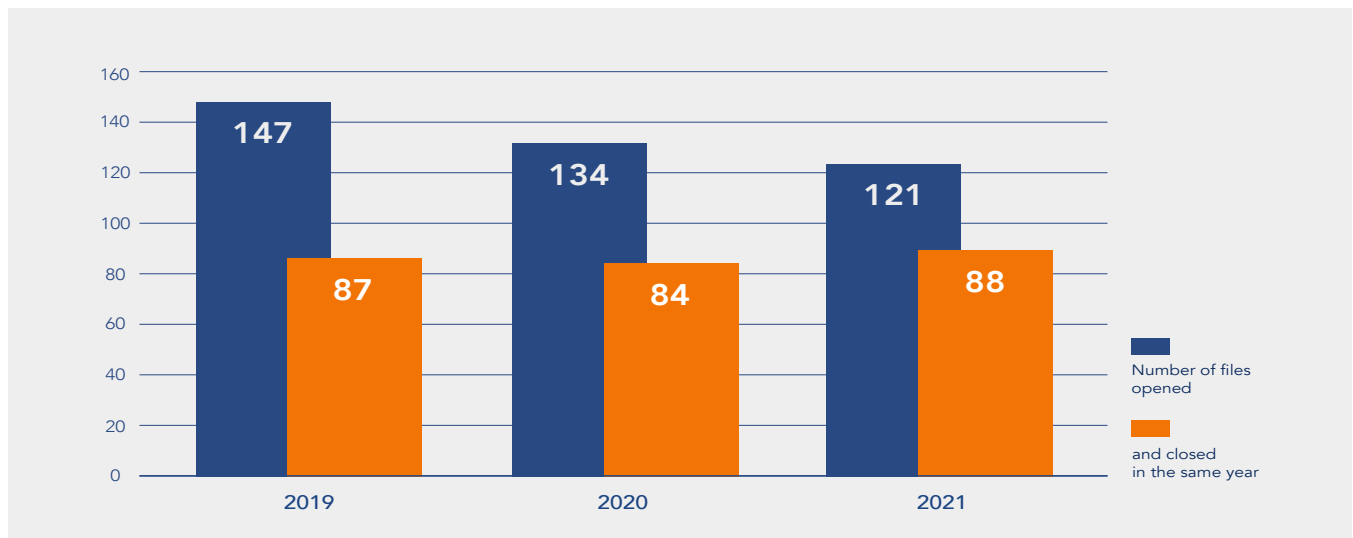
### Statistics relating to investigations

When a denunciation falls under the Inspector General's mandate and jurisdiction, or an investigation is initiated, a file is opened. All files undergo a rigorous analysis and investigative process involving many verifications and corroboration of information.

In 2021, 121 files were opened, compared to 134 in 2020.

As a result of the joint work of the Analysis and Preliminary Investigations and the Inspections and Investigations teams, 88 files, corresponding to 73% of opened files, were investigated and closed in 2021.

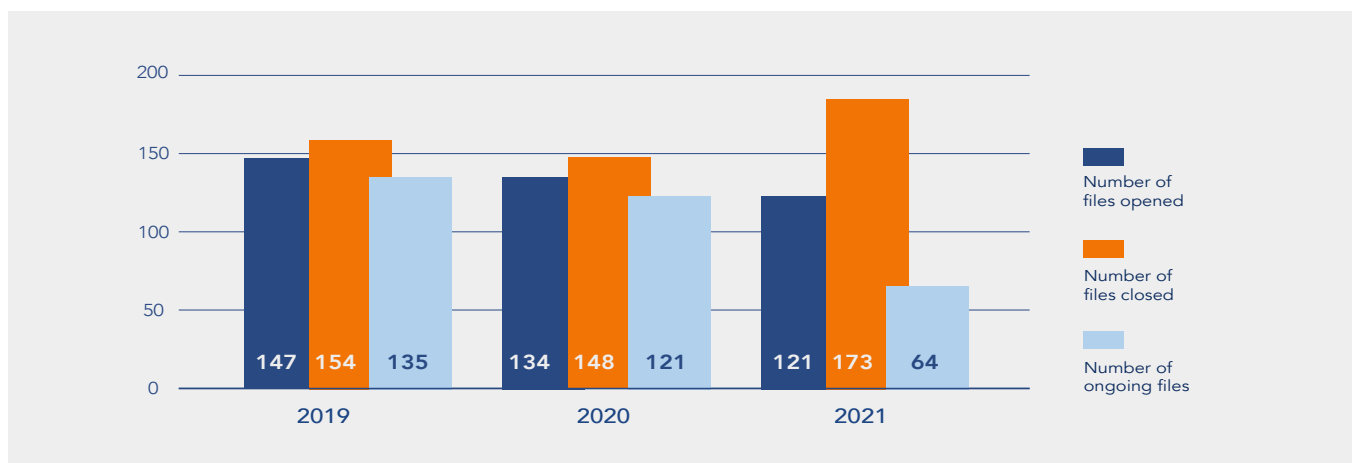
### NUMBER OF FILES OPENED AND CLOSED IN THE SAME YEAR



At the end of each year, a certain number of files remain open because the investigation is still ongoing. The total number of ongoing files is the number of files from previous years plus files opened during the year that could not be closed by December 31.

On December 31, 2021, 64 files were ongoing. The following chart shows opened, closed and ongoing files since 2019.

### NUMBER OF OPENED, CLOSED AND ONGOING FILES AT YEAR-END FROM 2019 TO 2021



In 2021, the Office closed a total of 173 files, 88 opened in 2021 and the remainder in previous years.

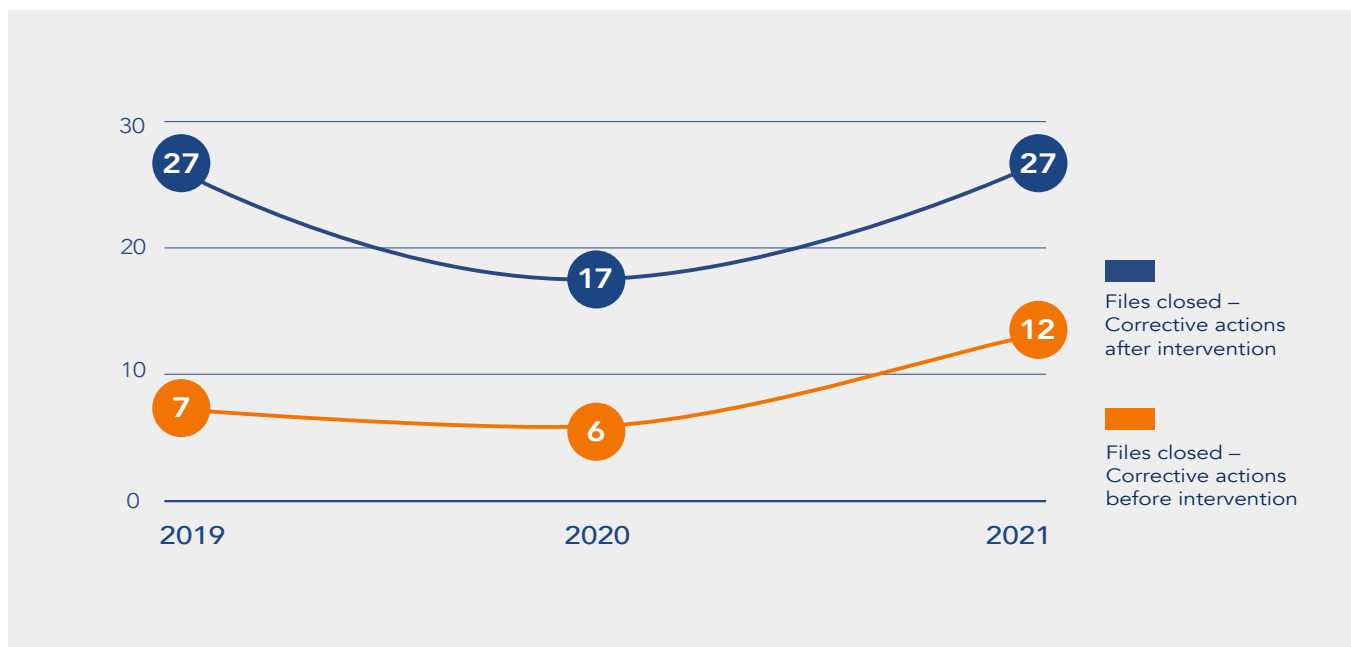
Of these, the Office intervened in some cases while the call for tenders was active or before the contract was awarded. This allowed it to correct irregularities in the contracting process or the tender documents.

Although the Office's powers allow it to make a public denunciation through a report setting out its findings and observations, it chose instead to take quick action by suggesting corrective measures to the contractees. If, after the publication of the addenda, everything was to its approval, the award process could continue with minimal delay or inconvenience.

In these cases, the Office's intervention was carried out in collaboration with the business units to correct certain deficiencies without requiring a thorough investigation. Sometimes the corrections were made as a result of initial communications, even before the Office had completed its analysis. In these cases, the Office conducts a quick analysis of the corrective actions, and if it finds that this step has been carried out by contractual standards, the process can continue.

The main objective of these interventions is to correct the situation as soon as possible and sometimes, as a preventive measure, to avoid lengthy delays in the contracting process or cancellation if the error cannot be corrected.

#### NUMBER OF CLOSED FILES FOR WHICH CORRECTIVE ACTION WAS TAKEN



## Mandate given under the *Act Respecting the Autorité des marchés publics*

Since May 25, 2019, the Office of Inspector General has also been responsible for duties and powers granted under the *Act respecting the Autorité des marchés publics* (ARAMP).

The ARAMP created the Autorité des marchés publics (AMP), which is charged with overseeing all public and municipal contracts in Québec, except for Ville de Montréal contracts. In its stead, the Office of Inspector General oversees the City's contracts and is bound by the same obligations as the AMP in its duties and powers. The reconstituted cities of the Montréal agglomeration, however, fall under the AMP's jurisdiction.

Under the ARAMP, in certain conditions a complaint may be filed with a municipal body regarding an open call for tenders. For Ville de Montréal (boroughs and central services), the Comptroller General is the first to receive and review complaints.

1. An interested party, usually a potential bidder, must submit their complaint to the project owner, which notifies the complainant of its decision.
2. If in disagreement with the project owner's decision, the complainant can contact the Office of Inspector General.
3. In some cases described in the ARAMP, a complaint can be filed directly with the Office of Inspector General.
4. An individual or corporation can disclose information to the Office of Inspector General at any time.

The Office of Inspector General examines the complaints and, if applicable, recommends appropriate measures to ensure healthy competition and the fair treatment of all bidders. It can also review the award and performance of a public contract after receiving information or in accordance with an intervention provided under the ARAMP.

On the Office of Inspector General website, interested parties can access all the documentation needed to file a complaint, to either the project owner or the Office of Inspector General.

For 2021, the Inspector General received two complaints related to a decision by Ville de Montréal and three complaints addressed directly to the Office of Inspector General. In three of the cases, the complaint was inadmissible because the complainant did not approach the project owner within the prescribed time frame. And in the other two cases, the complaint was unfounded because the project owner was within their rights and the tender documents complied with the normative and contractual frameworks.



# Analysis and preliminary investigations

- » Files closed during preliminary investigation and corrective actions taken after intervention
- » Monitoring

# Analysis and preliminary investigations

## Files closed during preliminary investigation and corrective actions taken after intervention

### Opening to the market

The Office of Inspector General received a denunciation from a potential supplier challenging the requirements in the specifications for the acquisition of articulated tractors. According to the supplier, the requirements were too restrictive and narrowed the market.

There was less than one week left before the submission date and the Office needed more time to analyze the situation, communicate with municipal stakeholders and, if possible, suggest corrective actions to bring the situation into compliance and allow the contract award process to move forward. The Office therefore requested an extension to the submission date in order to carry out these steps, which was accepted.

As the verifications advanced, it became apparent that the City's market study offered an inaccurate representation of the situation. It gave the impression that there were three potential bidders. Furthermore, reading the technical specifications revealed that none of the products met all the clauses. Two products did not meet several of the defined criteria and were therefore not in compliance with the requirements. The third product met the criteria with the exception of one aspect, which could constitute a minor or major deviation, according to the professionals' opinions.

After several interventions, addenda were issued to modify the project owner's requirements, take into account the products available and correct the specifications.

### Required warranty periods that could limit the market

In a call for tenders for landscaping work, the Office of Inspector General received a denunciation on bid submission date concerning the guarantee periods for planting trees and

shrubs, the duration of which far exceeded the standards requested in other calls for tender for the same type of work. The whistleblower stated that in order to offset the financial risks due to extended guarantee periods, bidders had to significantly increase their prices.

The Office contacted the business unit to suggest that they extend the submission date. This delay would provide a reasonable time to complete the steps and verifications required to ensure that the clauses and requirements in the specifications did not restrict the market and did not prevent the contractor from obtaining a fair price for the expected services.

After verifications and discussions with the contract authority about the City's actual requirements and the market study conducted for the call for tenders, as well as a comparison of the guarantee requirements specific to the kind of work requested, the business unit decided to issue an addendum to bring the guarantees more into alignment with market standards.

This intervention with the municipal official, who made the appropriate corrections, caused only a slight delay. However, it allowed the contracting process to continue without further impact.

### Contradictions in the specifications

In a call for tenders for multidisciplinary professional services, Ville de Montréal allowed the grant to a bidder composed of one or more co-contracting firms. In the specifications, the City required all firms to identify themselves and sign the bid form. Failure of one or more firms to sign it would result in the rejection of the bid.

The denunciation received while the call for tenders was active explained that the City had not clearly defined the responsibility of each of the signatories. They were wondering whether each firm would be held responsible for all the services requested in the contract or only for its specialty, specifying that one of the electrical engineering firms refused to sign the bid form because its share was barely 10% of the total contract.

As the bid deadline was less than five days away, the Office contacted the business unit to extend the deadline to allow sufficient time to analyze the situation.

The verification of the tender documents revealed a number of contradictions with respect to certain requirements concerning the group of companies. One clause specified that groups of persons (*regroupement de personnes*) were not authorized under the terms of the call for tenders, while another clause stated that the City accepts the creation of groups of persons for the call for tenders. It also specified that the bid must be signed by the representative, duly authorized by resolution, of each of the members making up the group.

With regard to bid and performance guarantees, the specifications stated that they were not required, whereas an addendum stated that they were. Many communications were exchanged with the business unit, leading it to remove the contradictions and more clearly define its needs concerning groups.

These corrections in the addenda allowed the process to continue in compliance with regulatory standards.

### Complying quickly with the normative framework

In spring 2021, the Office of Inspector General conducted an investigation into the awarding of contracts to an organization that did not have the authority to contract (REA) from the Autorité des marchés publics.

On October 19, 2020, City Council approved the signing of a contract by mutual agreement with Transvrac Montréal Laval Inc. for snow transportation services in 11 boroughs for a one-year period and an expenditure of \$12,360,957.56. The contract was awarded in accordance with the *Cities and Towns Act*,<sup>3</sup> as Transvrac held its brokerage licence, and it was for bulk trucking services. Ville de Montréal could award it a contract by mutual agreement because it was subject to an exception to the requirement to publish a public call for tenders.

Transvrac did not have its REA at the time of contract award or during contract performance in the winter of 2020-2021,

however. The Act<sup>4</sup> requires companies that wish to enter into service contracts with public bodies involving an expenditure of \$1,000,000 or more to hold their REA at the time they enter into the contract and for the duration of its performance. It appears from the decision summary authorizing the awarding of the contract that Ville de Montréal believed that Transvrac did not need to have this authorization as it was acting as an intermediary with its trucker members.

A company's obligation to hold an REA when entering into a public contract is linked to the expenditure generated by the contract,<sup>5</sup> and intermediaries such as Transvrac are not exempt from holding it.<sup>6</sup> This obligation is a condition of public order<sup>7</sup> that Ville de Montréal could not waive unless it obtained specific permission to do so, which it did not do for the contract awarded in October 2020.



During the investigation, the Office of Inspector General learned that the City was considering a new contract with Transvrac for winter 2021-2022 even though it still did not have its REA. A Notice to Interested Parties was sent on July 19, 2021, to Transvrac and Ville de Montréal to inform them of the preliminary findings of the Inspector General and to recommend that Transvrac file an REA application as soon as possible, following the tabling of a public report from the Office of Inspector General. As a result of this notice, Transvrac quickly applied for its REA to comply with the regulatory framework. In August, Transvrac received its REA, allowing it to enter into the new contract with the City for winter 2021-2022, in compliance with the regulatory framework.

<sup>3</sup> *Cities and Towns Act*, CQLR, c. C-19, para. 573.3.1.3.

<sup>4</sup> *Act respecting contracting by public bodies*, c. C-65.1, ss. 21.17 and 21.18.

<sup>5</sup> *MPECO inc. c. Ville de Sainte-Agathe-des-Monts*, 2021 QCCS 41, par. 48.

<sup>6</sup> *Autorité des marchés publics, Recommandations formulées au conseil municipal de la Ville de Saint-Hyacinthe concernant l'exécution du contrat conclu à la suite de l'appel d'offres public 1176174*, recommandation no. 2021-11.

<sup>7</sup> *Procureure générale du Québec (ministère des Transports, de la Mobilité durable et de l'Électrification des transports) c. 9150-0124 Québec inc (Groupe Diamantex)*, 2019 QCCA 879.

This case illustrates that the actions of the Office of Inspector General can lead municipal bodies and their co-contracting parties to take quick corrective action in order to comply with

the regulatory framework, and thus ensure the proper conduct of business.

## Monitoring

The Office of Inspector General has a team dedicated to analysis and preliminary investigations. One of the team's responsibilities is to receive denunciations through the hotline, which are essentially related to the award and performance of municipal contracts. Denunciations that are not within the mandate of the Office are transferred to the appropriate Ville de Montréal entity, such as the Comptroller General, the Service de police de la Ville de Montréal (SPVM), the Office of Auditor General, the Ombudsman and 311. Files may also be transferred to the Unité permanente anticorruption (UPAC).

In addition to the rigorous review of denunciations, every year the research officers in the Office of Inspector General monitor the awarding of contracts by the City and other entities subject to the Act.

Some factors are taken into account in the selection of files, such as the significant amounts spent on projects under the *Programme décennal d'immobilisations (PDI)* and the *Plan d'investissements de la Société de transport de Montréal (STM)*. Like lookouts watching for and signalling dangers at sea, the research officers, under the supervision of the Deputy Inspector of Analysis and Preliminary Investigations, raise a red flag when their research and data analysis reveal possible signs of collusion, contractual breaches or concerns about the normative framework.

To arrive at these findings, they examine similar contracts in the Québec government's electronic tendering system (SEAO), the Ville de Montréal decision summaries and the minutes of the Boards of Directors of the entities concerned. Discussions may also take place with project owners or potential suppliers. Depending on the results, the file may be closed because no contractual anomalies were identified or it may lead to a preventive intervention with the business unit. The file may also be transferred to their inspection and investigation colleagues for further investigation.

These are the files that attracted the attention of the Analysis and Preliminary Investigation team in 2021 and led to preventive interventions by the Office of Inspector General.

### Contracts awarded to a single bidder, year after year

A preliminary investigation by the Office of Inspector General led a Ville de Montréal department to change its contract award strategy for the purchase of snow removal and sidewalk cleaning vehicles and equipment. For seven years, the same company had been winning the calls for tenders from the municipal service for this type of equipment. In the last call for tenders, a number of interested parties requested the call for tender documents, but only one submitted a bid.

To identify the reasons for this lack of interest, the research officers examined similar municipal contracts in the SEAO and analyzed the decision summaries supporting the decisions made by the borough councils. Discussions were also held with the parties that requested the call for tender documents and the people responsible for drafting the specifications. This step revealed that the project owner preferred to combine all the procurement packages in a single call for tenders as it felt this facilitated the process and reduced the human resources assigned to mechanical maintenance at a competitive cost.

Using this turnkey strategy, the business unit limited the number of potential suppliers, as many did not have sufficient financial resources to offer the vehicles and equipment the unit was looking for, many of which came from subcontractors. This approach favoured the sole supplier that had all the equipment required. Companies said that they would like to bid on the next call for tenders if the municipal department issued a call for tenders for each set of specifications or for separate packages.

In the opinion of the Office of Inspector General, while it is legal to group several sets of specifications in a single contract that meets the needs of the project owner, it nevertheless restricts the pool of bidders and, by extension, free competition. This procedure also maintained an arm's length relationship between the winning bidder and the project owner, which contributed to its selection year after year.

The best option for fostering a competitive market is to issue calls for tenders for small packages and detailed performance specifications. The business unit has stated that it wants to change its tendering strategy for 2022.

<sup>8</sup> The Government of Canada's Competition Bureau has identified 18 warning signs in [Bid rigging: Detecting, preventing and reporting](#). These signs may be detected based on facts observed during the call for tenders process or noticed afterward.

Another in-depth analysis was carried out on a file related to the acquisition of custom-made spreaders. The Analysis and Preliminary Investigations team wanted to verify whether the contracting process was free of anomalies since the call for tenders had received only one bid, even though eight interested parties had requested the tender documents.

The information gathered revealed that the same supplier had been winning municipal tenders for this type of equipment for years. However, an analysis of the contracts awarded for this type of equipment at the provincial level revealed the existence of many manufacturers of the requested product. Discussions with these manufacturers about the Ville de Montréal call for tenders shed light on their lack of motivation and their fears arising from the fact that the bidders had to invest in the development and design of plans for the requested product.

The Office of Inspector General concluded that there were no irregularities in the contracting process, but a meeting was held with the business unit concerned, which was invited to explore ways to open the market further and attract other manufacturers to bid on future calls for tenders. The people interviewed showed a real desire to improve their practices, by, for example, studying the causes of manufacturers' withdrawal from the tendering process, making manufacturing drawings available and accepting proposals from several manufacturers for key components.

Since then, the project owner has issued a new tender that received two bids instead of one. This solicitation allowed the prices received to be compared and confirmed that Ville de

Montréal had paid a suitable price for the product sought in previous contracts. The project owner was therefore reassured that the previous supplier had not taken advantage of the situation to offer a custom product at a prohibitive cost. Finally, the changes to the tender documents restored healthy competition in a market that has been considered to be exclusive to a single supplier for years.

#### A closer look at some acquisitions

The Office conducted a strategic analysis of calls for tender and contracts for the acquisition of Azur trains and 12-metre hybrid and electric buses. For the acquisition of the Azur trains, which took more than a dozen years to complete, all the related calls for tenders were examined. All the acquisitions seem to have been carried out in accordance with the current normative frameworks.

With regard to the acquisition of hybrid and electric buses, an initial analysis noted several technical specificities and specific brands of equipment in the tender documents. Extensive analyses were therefore carried out in 2021, during which many a great deal of information and data were examined and studied. No contracting irregularities were found. This research, however, provided a portrait of a specialized sector and identified its key players and specificities. This information gathering will be helpful to the Office going forward for new tenders related to this type of contract.





# Inspections and investigations

## » Highlights

- Investigations completed in 2021
- Public report released in 2021
- Work site monitoring

## » Follow-up on reports from previous years

# Inspections and investigations

## Highlights

### Investigations completed in 2021

#### Refusal to cooperate in an investigation

In fall 2021, after a call for tenders issued by a borough, a denunciation led the Office of Inspector General to conduct several verifications as part of an administrative investigation. An Office investigator invited a company officer, whose bid was the only one declared compliant with the call for tenders, to meet with him. The company officer initially accepted the investigator's invitation but later declined. The bidder declined all subsequent interview requests.

By refusing to meet with the representative of the Office of Inspector General, the company officer was violating Section 21 of Ville de Montréal's contract management by-law, which states that every intervenor, director, officer or employee of the companies in question must cooperate fully and completely with the Inspector General and his or her designated representatives in verification and inspection operations related to any contract subject to this by-law. They must respond fully and truthfully, as soon as possible, to any request from the Inspector General or his or her designated representatives. They must arrive on time at the place designated by the Inspector General or his or her representatives to respond to requests for information from them. In the event of a failure to comply with this obligation during a call for tenders process, Section 25.1 of Ville de Montréal's contract management by-law allows the City, at its sole discretion, to reject that person's bid.

The borough followed the Inspector General's recommendation to use the contractual discretion allotted under the terms of the call for tenders documents and to reject the contractor's bid. After cancelling the call for tenders process, the borough was able to award a contract by mutual agreement and maintain quality services for its residents.

#### Conversion of a descriptive specification into a performance specification

In spring 2021, the Office of Inspector General received a denunciation concerning a call for tenders from Ville de Montréal for the purchase of water rescue equipment. The whistleblower alleged that the specifications were too restrictive and prevented him from bidding despite the fact that he offered a product that might suit the City's needs.

The specifications for this call for tenders contained very specific descriptive characteristics about the goods to be obtained rather than using performance criteria, as required by the *Cities and Towns Act*.<sup>9</sup> For example, the specifications stated that the reference models would be used as a comparative basis for the assessment of equivalencies, whereas equivalency requests are supposed to be evaluated based on the needs expressed in the specifications. Exact dimensions for the goods were also set out in the specifications, rather than a range of acceptable values.

The Office investigators therefore met with the business unit in question to discuss the reasons for establishing these specific requirements that discourage competition. The requestor then reviewed the specifications and made changes in several areas. For example, all supplier names, brands and models specified in the specifications were removed. The delivery time provisions were also revised, the guarantee requirements were loosened, and the package related to maintenance and service for ten years was removed. Sixteen addenda were issued, seven of which related to delaying the bid opening.

In summary, the interventions of the Office of Inspector General allowed the requestor to expand the competition market and make changes to its documents in order to issue performance specifications that meet the legal requirements while still continuing the tendering process.

<sup>9</sup> *Cities and Towns Act*, CQLR, c. C-19, s. 573.1.0.14.

## Public report released in 2021

In 2021, the Office of Inspector General published the *Report on the various contracts awarded to 11073192 Canada Inc. and the involvement in the award and performance of these contracts of a person ineligible for public contracts*. This report is the result of an investigation into a possible business relationship between Déneigement Na-Sa and Excavation Anjou Inc. following the receipt of three separate denunciations.

Excavation Anjou and its president, Yvan Dubé, are ineligible for Ville de Montréal contracts for a period of five years. Due to this ineligibility, which ends in March 2022, Excavation Anjou and its president cannot submit bids or enter into public contracts or subcontracts with Ville de Montréal. Furthermore, they may not do business with, work on or have any interest in any contract or subcontract with the City. The evidence gathered during the investigation proved the involvement of Yvan Dubé, both personally and through his company, in contracts granted by the City to Déneigement Na-Sa.

### The investigation

Déneigement Na-Sa was founded in 2018 by Nancy Desjardins and Samuel Dubé, who are its sole shareholders, directors and officers. They are also Yvan Dubé's spouse and son. Contrary to what the Déneigement Na-Sa officers told Office of Inspector General inspectors about Yvan Dubé's having been excluded from their company, the evidence gathered revealed that Mr. Dubé had provided work that Déneigement Na-Sa benefited from.

For example, investigators observed Yvan Dubé oversee the performance of snow removal contracts awarded by Ville de Montréal to Déneigement Na-Sa and speak with its supervisors and employees, both at the Excavation Anjou garage and at locations where snow removal operations were taking place. The investigators also observed him placing no-parking signs while driving a Déneigement Na-Sa truck and repairing vehicles assigned to perform snow removal contracts. The investigation also found that Nancy Desjardins emailed Yvan Dubé technical questions about another Ville de Montréal contract. Yvan Dubé's involvement was also known to several Déneigement Na-Sa employees.

The evidence revealed intertwined personal and business relations between Nancy Desjardins, Samuel Dubé, Yvan Dubé, Déneigement Na-Sa and Excavation Anjou. Besides the fact that Nancy Desjardins, Samuel Dubé and Yvan Dubé form a household residing at the same address, they work closely together on their respective business projects. For example, Déneigement Na-Sa leased first part and then almost all of the garage and head office of Excavation Anjou. It also leased or bought vehicles and parts from it at beneficial prices.

The evidence also included calls from Yvan Dubé to acquaintances to assist with the operations of Déneigement Na-Sa, which had also paid a hydro bill and an Internet, telephone and television bill for the family home. Samuel Dubé meanwhile continued to be employed by Excavation Anjou. The company provided him with wages, a truck and a cell phone for Déneigement Na-Sa's operations.

The investigation allowed the Inspector General to conclude that the personal and commercial ties between the officers and their companies are intertwined. The work performed by Yvan Dubé and the terms of payment he set through his company benefited Déneigement Na-Sa, Nancy Desjardins and Samuel Dubé. Conversely, the goods and services paid for by Déneigement Na-Sa benefited the entire household. For these reasons, the Inspector General concluded that section 16 of the by-law on contract management had been contravened, as Yvan Dubé had worked and acquired an interest in Déneigement Na-Sa and the public contracts awarded to it. The company's officers also allowed and tolerated this situation.

With respect to the seriousness of the breaches, the Inspector General has noted that, although they were fully aware of Yvan Dubé's ineligibility, Déneigement Na-Sa's officers, namely Nancy Desjardins and Samuel Dubé, still allowed him to work on and hold an interest in the performance of Ville de Montréal contracts and also tried to conceal this fact during the Office of Inspector General investigation. Consequently, the Inspector General terminated the three contracts awarded to Déneigement Na-Sa after Calls for Tenders 20-18054 and 20-18061.

Regarding the three street-cleaning equipment leasing contracts related to Calls for Tenders 19-17792 and 20-18010, the Inspector General cannot rescind them, as the investigation did not allow her to directly observe Yvan Dubé's involvement in them. The Inspector General believes, however, that in acting as they did, Déneigement Na-Sa, Nancy Desjardins and Samuel Dubé have irremediably undermined the relationship of trust contractually binding them to Ville de Montréal. As such, the Inspector General recommended to the municipal authorities that they be terminated.

### Follow-up

The Ville de Montréal Executive Committee passed resolutions in December 2021 making Nancy Desjardins, Samuel Dubé and Déneigement Na-Sa ineligible for Ville de Montréal contracts and subcontracts for two years and extending Yvan Dubé's ineligibility by three years. They have launched a court action challenging these decisions.

## Work site monitoring

Since its creation in 2014, in order to adequately carry out the responsibilities conferred by the law, the Office of Inspector General has set up an annual program to monitor work sites, which is carried out mainly during the peak season, summer. This program allows the Office to optimize its processes and increase its field presence. Therefore, in summer 2021, investigators and an intern from the Office of Inspector General were assigned to conduct monitoring and analysis in three sectors: construction waste management, the contracting process for the development of municipal parks and the management of housing renovation projects by the Office municipal d'habitation de Montréal (OMHM).

Spread over several months, this work may include analyzing specifications and bids, visiting sites, interviewing project owners, winning bidders, bidders and anyone else relevant to the file. This content will be useful for future Office investigations in these sectors. The monitoring efforts also expand the network of contacts and help project owners carry out their work in compliance with contractual regulations. Monitoring may also lead to preventive interventions.

### Management of demolition debris

Ville de Montréal awarded a contract for the demolition of a building it owns and for the disposal of debris. The Office investigators first analyzed the tendering process, which included seven bids, as well as the plan for transporting the debris to disposal or recycling sites selected by the successful bidder.

In July 2021, surveillance operations began for the transportation of the construction debris to the disposal sites. The investigators monitored the work for several days, observing that the contractor's trucks were moving brick, concrete and other demolition debris to a deposit site not authorized by the Ministère de l'Environnement et de la Lutte contre les changements climatiques (MELCC). The successful bidder was informed of this and undertook to find new sites with the necessary authorization.



Thanks to diligent verifications by the Office with MELCC and city officials, it was soon determined that several of the sites subsequently proposed by the successful bidder were no more suitable to receive the materials, as they did not have the required authorizations. Furthermore, despite communications with the contractor and warnings, the Office of Inspector General discovered another load of debris dumped at another unauthorized site, and the contractor was immediately advised to stop delivering debris there. After several unsuccessful searches, the successful bidder finally found a duly authorized site and the project was able to proceed.

## The oversight of construction waste management entailed

**26** days of field monitoring

**221** documents analyzed

The intervention of the Office of Inspector General resulted in prompt corrective action and the disposal of construction debris in compliance with the contract and with the applicable environmental standards. This file also allows the Office of Inspector General to reiterate the importance of meeting environmental requirements during municipal work, for both the management of demolition debris and the disposal of contaminated soil.<sup>10</sup> The co-contractors and the City both have responsibilities. Contractors must proactively identify and verify that a site is authorized to receive the materials in question.

In addition, the City must ensure, as it often requires in its specifications, that the sites submitted to it by its contractor are verified as soon as possible. The Service de l'environnement is a specialized resource for this and is available for consultation by municipal stakeholders. Finally, the City must be especially vigilant when, as in this case, a bidder's proposed price for the disposal of demolition debris differs significantly from its competitors.

#### Park development

The second monitoring area focused on business unit practices to support a balanced, competitive marketplace in the park development sector. Investigators conducted interviews with more than 15 contractors and analyzed approximately 60 playground, synthetic field and track projects.

The interviews, data collection and analysis tend to confirm the use of practices that target specific products. In order to put an end to this professional practice, which goes against Bill 155, the Inspector General and Comptroller General are jointly developing a training program on writing performance specifications.



#### Renovation of OMHM housing

After a denunciation received in February 2020 about the Office municipal d'habitation de Montréal (OMHM), the Office of Inspector General launched an investigation to monitor renovation projects in OMHM housing.

The para-municipal organization has awarded renovation contracts of \$12 million annually for its entire territory, comprising nearly 23,000 housing units. Every year, 8,000 purchase orders are issued for these projects.

During the monitoring work, 23 testimonies were gathered from OMHM employees and managers and from officials at companies contractually related to the renovation of vacant and occupied units. The Office investigators visited 65 housing units undergoing renovations.

The monitoring work and analysis of the data collected did not reveal breaches in contract performance, but there were some issues that deserved to be brought to the attention of OMHM managers and key stakeholders. A meeting was held to communicate the findings and comments obtained from the winning bidders in order to improve procedures in the performance of the contracts. Discussions also focused on ways to standardize the evaluation system and issue unsatisfactory performance evaluations when required. The OMHM's future tenders for housing renovation contracts are expected to include corrective actions arising from the findings of the Office of Inspector General.

#### Conclusion

The Office of Inspector General annual work site monitoring program is a thorough, rigorous local operation conducted at various Ville de Montréal work sites. The presence of a team of investigators, whose purpose is to ensure compliance with legal provisions of contract performance, is meant to be reassuring, and it provides opportunities for interaction with site supervisors, contractors and those responsible for the contracts in question.

When anomalies are observed, the Office takes action promptly with the municipal contract manager to make the necessary corrections, in compliance with the applicable rules. Under the powers conferred by the *Charter of Ville de Montréal*, the Inspector General can, in the event of serious breaches, suspend the work in progress and demand corrective action.

<sup>10</sup> 2019 Mid-Year Report for January 1 to June 30, 2019, pp. 8-28, <https://www.bigmtl.ca/en/publications/2019-mid-year-report-for-january-1-to-june-30-2019/>.

## Follow-up on reports from previous years

### Contaminated soil management

In her 2019 mid-year report, the Inspector General presented the findings of an in-depth investigation on the City's management of contaminated soil. One of the solutions that the Inspector General recommended to the City is to establish one or more temporary storage sites for lightly contaminated soil from its work sites in order to minimize the risk of illegal dumping contaminated soil.

In October 2020, in response to this recommendation, the City acquired the platform for sorting excavated material from Parc d'entreprises de la Pointe-Saint-Charles (PEPSC). Since this acquisition, soil from excavations carried out by the Sud-Ouest, Verdun and Ville-Marie boroughs have been transported to the PEPSC platform, freeing up their works yards. The Service des infrastructures du réseau routier also plans to use the site in 2022 as part of a major construction site in the downtown area. In the medium term, the City plans to operate three to four temporary storage platforms throughout Montréal.

The PEPSC temporary storage platform is not authorized to receive sludge from municipal sumps and sewers at this time. The City's management of this sludge was the focus of a recommendation from the Inspector General in her May 2020 report on the cleanup of sumps and sewers, including the transportation and disposal of the residue. The City is exploring the possibility of managing this waste on future storage platforms that will be set up on the island.

In her 2019 mid-year report, the Inspector General also noted that leading-edge expertise in this area was not uniformly distributed across the City's many departments and boroughs. She recommended the development of a best practice guide to share knowledge with all stakeholders involved in designing and monitoring contaminated soil excavation. To address this recommendation, in 2021, Ville de Montréal developed the *Guide de bonnes pratiques pour la gestion des sols contaminés* for all its business units. Two other guides were published that year, one on the management of non-characterized soils excavated during small-scale work and the other to guide project owners in the selection of environmental professionals.

Finally, the Inspector General recommended defining a procurement strategy to enter into framework agreements with several disposal sites in order to significantly reduce the risk of illegal dumping of soil from city work sites. A multi-party expert committee, led by the Service de l'approvisionnement, is examining the best option for existing framework agreements to optimize the management of contaminated soils on the City's sites. The soil traceability by-law, which came into force on January 1, 2022, also offers part of the solution to illegal dumping.

### STM cost overrun

The Société de transport de Montréal (STM) was investigated by the Office of Inspector General for amendments to two procurement contracts and one service contract that resulted in significant cost increases. The investigation revealed, in the Inspector General's 2021 mid-year report, that by making certain contractual amendments, the STM violated the *Act Respecting Public Transit Authorities* and its by-law on contract management.

During the investigation, STM implemented a number of measures to review its procedures and, in its response to the Notice to Interested Parties, proposed other measures that could be implemented in the medium term, including setting up a mandatory internal training program for its procurement employees, which would be recorded in a register specific to each employee.

The STM confirmed that it has changed its mandatory training program to clarify the principles that apply to contract amendments and added an information session with a legal expert to the onboarding plan for all new contract administrators. The drafting of an annual review is expected to begin in April 2022, and the training register for contract administrators is expected to be implemented in the second quarter of 2022.

### Integrated sales and collection system for transit tickets

In 2018, as a result of a denunciation filed with the Office of Inspector General regarding a contract by mutual agreement in 2014 for the provision of a multi-component integrated system for the sale and collection of transit tickets, one component of which was related to the provision of related equipment, an investigation was initiated by the Office of Inspector General. The whistleblower filed the denunciation stating that some suppliers could provide equipment compatible with the central computer system managed by the winning bidder and that, consequently, the component related to the supply of this equipment should have been the subject of a separate call for tenders.

The contract had been initially awarded to the successful bidder in 2003, following a public call for tenders. At the end of the initial contract, in 2014, STM awarded a three-year contract by mutual agreement consisting of two extension options of two years each. STM based its decision on an exception in the *Act Respecting Public Transit Authorities* that allows it to bypass the public tendering process if the purpose of the contract resulted from the use of a software package or software and was intended to ensure compatibility with other existing systems, software packages or software.

Since the computerized ticket management system is the property of the successful bidder and has been adapted over time to meet the needs of STM and its clients, the potential interoperability of the system with equipment and components from other suppliers was limited and the probability of IT problem situations affecting the day-to-day operations of STM was high, due to the central role played by the system in question.

While the use of this legislative provision was not put into question by the end of the investigation, it is nevertheless an exception to the general rule of open and competitive tendering on the market by way of a public call for tenders. This exception should be avoided as much as possible in order to avoid distorting the normative framework established by the legislator and to minimize the risk of creating a dependency relationship with the supplier due to a lack of competition. The use of this legislative exception must also be part of a rigorous, structured and well-documented approach. In this context, the exclusive contractual relationship between STM and the supplier had been maintained for 18 years, not without difficulty. That said, while the interoperability of computer systems and equipment cannot be guaranteed every time or in the short term, this must be the public body's objective wherever possible.

The Office of Inspector General shared these observations with STM. It responded that it was in the process of developing a strategic plan that involved, for instance, progressively moving away from certain aspects of this exclusive contractual relationship and being able to take advantage of the benefits provided by the competition underlying the public tendering process.

Since then, the ticketing system has been transferred to the Autorité régionale de transport métropolitain, which launched the digital mobility program in October 2021 and plans to seek approval for a completed target mobility architecture by December 2022. The delivery phase will include the central system and equipment, and the full transition is expected to take place over a period of approximately five years.



# Prevention and training

- » Prevention activities
- » The training program

# Prevention and training

## Prevention activities

The Office of Inspector General regularly intervenes with various Ville de Montréal stakeholders and related legal entities from the time they publish calls for tenders and until the performance of the awarded contracts begins. Observations made during these steps can be used as a teaching tool for people responsible for contract management within the City.

### Prevention newsletter

The Office of Inspector General publishes the *Prevention newsletter* twice a year. This document, first published in December 2020, aims to inform stakeholders involved in the municipal contracting process of best practices to adopt in their field, based on examples that have been addressed by the Office. This tool is part of the Inspector General's training and prevention mandate.

The theme of the first newsletter for 2021 concerns the use of experience clauses in calls for tenders. While including experience clauses in calls for tender is a good way to encourage the qualification of future winning bidders for Ville de Montréal contracts, this type of clause must be used and applied properly, to avoid unnecessarily restricting competition. The second newsletter focuses on the concepts of contingency and impact, to help contract managers to apply them properly pursuant to the City Council by-law on contract management and Ville de Montréal regulations. All the findings result from preventive interventions and cases handled by the Office of Inspector General that led to changes in the tendering process in order to allow more companies to submit bids, thereby favouring competition.

The *Prevention newsletter* is available on written request to [prevention@bigmtl.ca](mailto:prevention@bigmtl.ca).



**VOLUME 2**  
**NUMÉRO 2**  
**DÉCEMBRE**  
**2021**

**BULLETIN DE PRÉVENTION**  
DU BUREAU DE L'INSPECTEUR GÉNÉRAL

**DANS CE NUMÉRO**

<p><b>PEUT-ON MODIFIER UN CONTRAT EN COURS ?</b></p> <p><b>DÉFINITION D'UNE CONTINGENCE</b></p> <p><b>DÉFINITION D'UNE INCIDENCE</b></p> <p><b>ENCADREMENT SPÉCIFIQUE À LA VILLE DE MONTRÉAL</b></p> <p><b>LES PROVISIONS POUR LES CONTINGENCES ET INCIDENCES</b></p> <p><b>RÉFÉRENCES</b></p>	<p><b>PEUT-ON MODIFIER UN CONTRAT EN COURS ?</b></p> <p>Lors de l'exécution d'un contrat municipal, qui a fait l'objet d'un appel d'offres, les responsables de la gestion contractuelle peuvent utiliser le budget prévu pour les contingences afin de réaliser de nouveaux travaux. Ils peuvent aussi faire appel au budget pour les incidences. Dans quel budget alors puiser lorsque survient une modification en cours de réalisation du contrat et à quelles conditions ? Si les provisions réservées aux incidences n'ont pas été dépensées peuvent-elles être transférées aux provisions réservées pour les contingences ?</p>	<p><b>À la suite de la lecture de cette nouvelle édition du Bulletin de prévention du Bureau de l'inspecteur général, vous serez en mesure de distinguer les concepts de contingences et d'incidences et de bien les appliquer en vertu du Règlement du conseil de la Ville sur la gestion contractuelle et des encadrements administratifs de la Ville de Montréal. Il a été rédigé à partir d'observations sur des irrégularités constatées dans le cadre de contrats municipaux et pour lesquelles l'inspectrice générale souhaite rappeler les règles afin d'éviter leur répétition.</b></p>
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**DÉFINITION D'UNE CONTINGENCE**

<p>Une contingence est une modification à un contrat octroyé à la suite d'un appel d'offres visant l'ajout de travaux, de services ou de biens. Indépendamment de la valeur de la modification et à condition de respecter le cadre normatif et d'avoir les autorisations budgétaires nécessaires, il n'y aura pas de nouveau contrat à conclure pour cette contingence.</p>	<p>La Loi sur les cités et villes stipule qu'un contrat ne peut être modifié par une municipalité à moins que la modification (ou contingence) respecte les deux conditions cumulatives suivantes : la modification ne doit pas changer la nature du contrat et doit constituer un accessoire à celui-ci. Bien que la loi n'apporte pas de définition précise à ces deux critères cumulatifs, la jurisprudence offre des balises quant à leur application.</p>
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### Prevention activities

Not all disclosures made to the Office of Inspector General necessarily result in a public report, and many of them may trigger prevention efforts after an investigation, as evidenced by the monitoring work that was carried out on the Office municipal de l'habitation de Montréal housing renovations (see page 37).

In the event of the cancellation of a contracting process or the suspension or termination of a contract, the Office's decision may include a prevention activity. After the publication of a report, representatives of the Office of Inspector General meet with the business units concerned, or with other units facing similar situations, to make them aware of the problems revealed in an investigation and to formulate recommendations for continuous improvement. The recommendations cover both the procurement process, to make it more fair, transparent and open, and the follow-up during the performance of the contract, to ensure compliance with contractual requirements. The findings resulting from investigations allow the Office to intervene effectively with business units and enrich its training program to reflect the realities and needs observed in the field.

For example, to follow up on the *Recommendation report regarding contract management by Ville de Montréal's rolling stock and shops department* tabled in September 2020, the Office held prevention meetings with municipal business units known to make frequent use of contracts by mutual agreement.

These units were able to take preventive action by adopting best practices when forecasting their needs in order to better regulate the award process and significantly reduce the number of contracts by mutual agreement awarded, in compliance with the City's rules and regulations. An Office prevention activity may also result from an Office investigation that identifies areas that could be improved even though they are not contractual breaches, to encourage the adoption of best practices.

Since 2017, prevention activities have proven to be an excellent complement to training, as they are a suitable and rapidly deployable corrective response tool for the City, municipal bodies and para-municipal organizations in efforts to maintain contractual integrity at Ville de Montréal.

## The training program

Under Section 57.1.8 of the *Charter of Ville de Montréal, metropolis of Québec*, the Inspector General is mandated to provide training to members of City Council, civil servants and employees so they can recognize and prevent breaches of integrity and the violation of rules that apply to the Ville de Montréal contracting process and the performance of those contracts.

The Office of Inspector General's training program has been available since fall 2017 to all elected officials and employees of Ville de Montréal, related bodies, para-municipal organizations and external organizations. In 2021, the Office's program surpassed the 10,000 mark, reaching 10,246 participants by year-end. A total 4,758 people have attended at least one Office of Inspector General training session.

In 2021, the public health measures associated with the COVID-19 pandemic persisted, eliminating any possibility of in-person training. However, building on the experience of the previous year, when the training team overhauled its tools in order to pursue its operations, the Office of Inspector General completed the process begun in 2020 of reviewing the content of every training session to shorten them and adapt them to webcast delivery. A new development this year is that the standard training courses have been added to the Ville de Montréal Espace d'apprentissage platform. This allows all city

officials to check the training schedule and register online for the courses they want.

The Office has continued to offer the following courses by videoconferencing, in 112 separate training sessions:

- » The Inspector General and integrity
- » Collusion and cost estimates
- » Interpreting and applying contractual requirements
- » Contracting with non-profit organizations
- » The Inspector General and the *Act respecting the Autorité des marchés publics*:
- » Together for integrity (in collaboration with the Unité permanente anticorruption and the Office of Comptroller General of Ville de Montréal)

In 2021, 1,736 people from Ville de Montréal, related bodies and external parties attended virtual training sessions offered by the Office of Inspector General. The Office is fully invested in preparing and delivering its courses, and the evaluations completed by the groups show that its efforts are producing excellent results: 99.5% of those who responded to the evaluations said they were satisfied with the course they took and almost 50% gave it a perfect score. Building on this success, the Office hopes to reach even more people in 2022.

In addition, as it does every year, the Office has continued to offer training to Ville de Montréal bodies and para-municipal organizations. This year, 16 training sessions were offered to the Société de transport de Montréal, the Office municipal d'habitation de Montréal and the Pointe-à-Callière museum.

Although the training program was designed specifically for the City and the para-municipal organizations, the Office continued to work with the École de technologie supérieure to share the findings of its investigations with its clients. Eight times this year, the Office gave its presentation on the procurement process (*Les enseignements des dossiers enquêtés par le Bureau de l'inspecteur général dans le processus d'approvisionnement*) in a course on construction contract management. A total of 289 students attended presentations given by the Office of Inspector General in fiscal 2021. The Office also extended its external collaboration to the Groupe des approvisionneurs des services publics et parapublics, which sought its services to provide training on eligibility conditions and compliance criteria to its members.

In 2021, two information videos were also added to the Office of Inspector General's website, not only for Ville de Montréal employees, but also for anyone in the general public interested in learning more about contract integrity:

- » Introduction aux activités du Bureau de l'inspecteur général de la Ville de Montréal: surveiller et enquêter, dans l'intérêt de tous!
- » Communiquer avec le Bureau de l'inspecteur général, les premiers pas vers l'enquête!

### 2021 training statistics

**320** hours  
of training

**1,736** participants

**1,383** screenings  
of training videos

**99.5 %**

of those who responded to the evaluations reported being satisfied with the training they took and almost 50% gave it a perfect score.



# Our human and financial resources

- » Social engagement
- » Outreach
- » Budget and accountability
- » Equal access to employment

# Our human and financial resources

## Social engagement

### Social engagement

This year, the Office of Inspector General staff continued the tradition of engaging in charitable activities. In addition to improving the quality of life of vulnerable people in Montréal through their generosity, these activities gave the staff the chance to share time in person, in the spirit of solidarity and good humour, with colleagues whom they had seen mainly on a virtual platform during the year.

### 2021 Centraide Walk/Run event

Most of the Office of Inspector General's staff participated in the City's annual fundraising activities for [Centraide of Greater Montréal](#) and the [Canadian Red Cross – Québec Division](#), including 19 colleagues who signed up for the Ville de Montréal 2021 Centraide Walk/Run. Many of them met up to walk or run together at Parc Maisonneuve in Montréal or Parc Michel-Chartrand in Longueuil. The donations collected at the Office amounted to \$6,521. Centraide of Greater Montréal received \$5,421, and the Canadian Red Cross – Québec Division received \$1,100.



For the Centraide Walk/Run event, members of the Office of Inspector General gathered at Parc Michel Chartrand in fall 2021.



The Office of Inspector General once again supported Sun Youth in its Christmas basket campaign. Colleagues delivered toys and food to the charitable organization.

## Outreach

### Speaking engagements

The Inspector General and the Deputy Inspector Generals regularly have opportunities to speak about the Office of Inspector General's structure, mandate and mission, as well as present examples of cases. In 2021, the Office of Inspector General's management spoke at the following events:

- » Virtual conference – Forum on public contracts, by Événements les Affaires
- » Virtual conference – Interpretation and Application of Contractual Requirements, organized by the Association des directeurs généraux des municipalités du Québec (ADGMQ)
- » Seminar – Artificial intelligence contract management, by the Barcelona Metropolitan Area Transparency Agency
- » Conference – Emerging Challenges in Anti-Corruption, by the University of Ottawa Corporate Ethics and Financial Crimes Expert
- » Webinar – Protecting Democracy through Anti-Corruption, by the École nationale administration publique (ÉNAP)
- » Conference - Les nouveaux défis en matière de lutte contre la corruption, MBA program, École des sciences de la gestion, UQAM;
- » Publication in *Marchés publics et grands projets d'infrastructure: comment gérer les risques éthiques?* Revue Éthique publique, vol. 23, no. 1, 2021.

### Inspector General's conference

In March, the Inspector General gave her first web conference, called *Les entrevues d'enquête: d'un art à une science* (investigative interviews: from art to science), with guest speaker Michel St-Yves, forensic psychologist at Sûreté du Québec. A second web conference was held in June on the development and relevance of investigative journalism. The speakers were Brian Myles (*Le Devoir*), Vincent Larouche (*La Presse*) and Félix Séguin (Quebecor and TVA).

### Whistleblower Awareness Day

The Office of Inspector General helped organize the first Whistleblower Awareness Day. Under the theme Working Together to Strengthen the Integrity of Public Bodies, this initiative by the Forum des partenaires en intégrité publique was designed to raise awareness of the importance of whistleblowing among the general public and the staff of public bodies.

### Coordination committee

Since 2017, the Coordination committee for the contractual integrity units has been meeting to share best practices and emerging trends in contract delinquency. Three meetings were held in 2021, bringing together people from the following organizations:

- » Office of Inspector General of Ville de Montréal
- » Bureau d'intégrité et d'éthique conjoint Laval-Terrebonne
- » Bureau d'inspection contractuelle de la Ville de Longueuil
- » Bureau de l'intégrité professionnelle et administrative de la Ville de Saint-Jérôme
- » Autorité des marchés publics
- » Unité permanente anticorruption

### Public integrity partnership forum

The public integrity partnership forum brings together several public bodies to share best practices and information to enhance the performance of units whose mandate is primarily focused on integrity. The forum met three times this year: in January, May and October.

The forum participants consisted of:

- » Protecteur du citoyen
- » Office of Inspector General of Ville de Montréal
- » Unité permanente anticorruption
- » Commission municipale du Québec
- » Autorité des marchés publics
- » Commissaire à l'intégrité municipale et aux enquêtes (part of the Ministère des Affaires municipales et de l'Habitation)
- » Commission de la représentation électorale
- » Commissaire à l'éthique et à la déontologie

### Board of Directors of the Association of Inspectors General

In November, as part of her duties, the Inspector General served on the Association of Inspectors General's (AIG) Board of Directors Meeting 2021 in Atlanta, United States.

## Budget and accountability

In 2021, the original budget of the Office of Inspector General was set at 0.11% of the City's total operating budget, which represents nearly \$6.5 million (\$6,583,800).

Expenditures were \$4.2 million (\$4,274,300), consisting of \$3.7 million (\$3,726,100) in salary expenses and \$548,200 in non-salary expenses.

The overall favourable variance between expenditures and the original budget corresponds to the unspent amounts budgeted

for professional services. These amounts are reserved for special projects and contingencies. The unspent \$2.3 million (\$2,309,500), representing 35% of the original budget, will be returned to the City surplus.

The table below presents the Office of Inspector General's original budget, total expenditures and allocation of expenses in dollars and percentages, for the year ended December 31, 2021.

In thousands of dollars:		
<b>BUDGET</b>	<b>6,583.8</b>	<b>100%</b>
<b>EXPENDITURES</b>	<b>4,274.3</b>	<b>65%</b>
Salary expenses	3,726.1	57%
Compensation and professional dues	3,726.1	57%

Non-salary expenses	548.2	8%
Rental, maintenance and repair expenses	17.0	0%
Technical and Other Services	92.2	1%
Durable and non-durable goods	165.4	2,5%
Professional fees	231.7	3,5%
Transport and communication	41.9	1%
<b>VARIANCE</b>	<b>2,309.5</b>	<b>35%</b>

## Equal access to employment

The following table illustrates the staff breakdown at the Office of Inspector General as of December 31, 2021, based on the groups targeted by the *Act respecting equal access to employment in public bodies*.

Category	Number	Percentage
Men	15	55%
Women	12	44%
Aboriginal people	0	0%
Visible and ethnic minorities*	1*	3%
Disabled persons	0	0%

\*This group includes both men and women

Submitted to City Council  
and the Agglomeration Council

For the year ended December 31, 2021

Section 57.1.23 of the *Charter of Ville  
de Montréal, metropolis of Québec*



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