UPDATE ON RECOMMENDATIONS FOR BC POLICE ACT REFORM[1]

I am an administrative lawyer. It is that experience that has informed my approach as counsel retained by the Police Complaint Commissioner to assist him in the project of proposing *Police Act* reform. My principal focus in administrative law has been as legal counsel for statutory decision-makers responsible for carrying out the legislature's intention in administering numerous different regulatory statutes.

Having worked for close to 20 years in this field, and having worked with numerous regulatory regimes and decision-makers, there have emerged for me several fundamental truths which separate sound regulatory models from those which do not succeed. I will share with you four such truths with you as being particularly important in respect of legislation governing the police complaint process.

- The first is the importance of clarity in legislative language, to ensure that those responsible for administering and applying the legislation can get on with the task at hand without unnecessary jurisdictional wrangling.

- The second is the importance of clarity in legislative purpose, to ensure the statute's provisions all pull in the same direction, rather than operating in conflict with each other.

- The third is the importance of being able to effectively get to the truth of the subject matter of concern, to ensure that, whatever outcomes are reached under the statute, those outcomes are reached in processes which have real forensic integrity.

- The fourth is the importance ensuring that those responsible for providing civilian oversight have proper and meaningful independence, so that they can fearlessly and impartially make decisions as between persons who hold radically different view points and who advocate from perspectives that may be subjectively easy to understand, but that are not necessarily tempered either by impartiality or fairness.

---

[1] Frank A.V. Falzon, Barrister and Solicitor, October 2006

Most people would surmise that these four truths are pretty basic, and they are. And yet those who are at all familiar with the process by which legislation is made will know that they can sometimes be difficult to achieve, and this is especially so where, as here, legislation is the result of compromise. In this respect, Commissioner Ryneveld's Green Paper, issued in August of this year, offers this candid statement:

> Before turning to the discussion section of this Report, I wish to acknowledge a point made by both police groups and complainant groups alike – namely, that for the system to operate, there must be a measure of "buy in" from affected constituencies. There is considerable merit in pursuing consultation and consensus, and indeed those considerations have been at the forefront of this *White Paper* process. But I feel it necessary to emphasize as well that the concern for "buy in" must not be allowed to transform the reform process into a negotiated settlement. Indeed, I would go so far as to say that many of the most serious difficulties with the existing *Police Act* arise from the very fact that the present *Act* placed negotiation over the pursuit of principle.
>
> One must be realistic, but principled. Civilian oversight of police raises hard questions. As any fair-minded person will see after reviewing the Special Committee's proceedings, or the present process, answering certain key questions does not admit of compromise. In a statutory context such as this, the pursuit of compromise can result in the worst of both worlds. The only way forward is to ensure that any reform package is fully principled, realistically grounded, and transparently reasoned. This will ensure both legitimacy and public confidence even if one group or another is unhappy with a particular policy choice.

For those of you who are not familiar with the BC statute, I will take a couple of steps back.

The current BC *Police Act* had its genesis in then Justice Wally Oppal's 1994 *Inquiry Commission Report into policing in British Columbia*, which Report reviewed, among other subjects, the police complaint process as it existed under the Police Act of the day.

It is clear from that Report that Justice Oppal was not persuaded that police abuse of citizens was rampant, or that internal investigators were institutionally incapable of conducting fair, thorough and prompt investigations so as to require all investigations to be conducted by a special external force. He did, however, conclude that a fundamental safeguard ought to be added to the legislation:

> The Inquiry believes that the objective of civilian oversight in the public complaints process can best be achieved by the establishment of a public complaints commissioner, who would have complete authority to oversee, review, initiate and, if necessary, investigate complaints. Under this system, the police would be entrusted with the investigation of public complaints at the first instance…. If the complaint commissioner

> thought the investigation of an officer was inadequate or unfair, the commissioner would have the authority to conduct a further investigation, either by the same investigators or investigators chosen by the commissioner. The complaint commissioner must have complete independence….
>
> [We] can achieve both impartiality and the goals of community-based policing (1) by combining the objectivity of the complaint commissioner with the expertise of police on investigative teams and (2) by giving the complaint commissioner better access to police file information, more control over communication with complainants, more power to monitor all investigations, the opportunity to investigate service and policy complaints or public trust issues, and the freedom to conduct investigations independently or with police as required. [footnotes omitted]

I do not have time in these remarks to summarize the many useful recommendations contained in the *Oppal Report*. I will only emphasize, for clarity, that the Oppal model does not vest the Commissioner with the power to adjudicate officer misconduct. That authority would remain vested in the police chief as discipline authority. Such decisions would be subject to review by the Commissioner, but if the Commissioner wanted those decisions reviewed by an independent person, that person would be a retired judge sitting as an adjudicator, and the Commissioner would have to effectively prove the default by appointing Commission Counsel to pursue the matter a full *de novo* public hearing – a public hearing that could only be ordered by the Commissioner where he was satisfied the hearing was in the public interest, and which hearing could also be required by Respondent police officers as of right in certain cases.

The Legislature adopted Justice Oppal's recommendation to appoint an independent Police Complaint Commissioner, but it did not adopt his recommendation that the Commissioner have the independent authority to investigate police complaints. Today, some 12 years later, the issue whether the Commissioner ought to have such jurisdiction is very much a live and very fundamental issue, which I will address in more detail later.

You may be interested to learn that four years passed between Justice Oppal's 1994 Report and the passage of the present *Police Act* in 1998. During that period, Dr. John Hogarth was retained by Government to facilitate an extensive stakeholder consultation process with police chiefs, police unions, civil liberties groups, first nations and community groups, with the purpose of seeking to build consensus on a final legislative reform package. As Dr. Hogarth candidly acknowledged in 2002 before the Special

Legislative Committee, it is not easy drafting by committee. He acknowledged that there were certain proposals he did not necessarily agree with, but they were included in the package "so that it can be all hugs and kisses when we have a press conference", and "so that Government, being government, could have a good news story". It is in the context of Dr. Hogarth's comments to the Special Committee that one might consider Commissioner Ryneveld's comments about the need for future reforms to be informed by a principled realism.

Commissioner Ryneveld was appointed effective February 1, 2003. A reader of his Annual Reports and public decisions will see that it did not take him long to begin to express considerable frustration about the legislation's inadequacies in allowing to achieve his goal of effective civilian oversight. His very first Annual Report emphasized how "too much time, energy and scant financial resources have been spent arguing about the wording, intent and authorities provided for under the statute".

Commissioner Ryneveld observed that reform of the *Police Act* did not appear to be on the agenda of legislators despite the Special Legislative Committee having proposed amendments in 2002. And so it was that, in March 2005, Commissioner Ryneveld determined himself to kick-start meaningful public discourse concerning *Police Act* reform by issuing a White Paper and draft *Police Complaint Act* for review by the Legislative Assembly, the Executive Branch, stakeholders and the public.

The White Paper is predicated on four principles. The first is that, just as the important and noble function of policing is fundamental to any free and democratic society, the civilian oversight of complaints against police must today be regarded as a fundamental safeguard in a free and democratic society. Second, effective civilian oversight requires a sound legislative foundation. Third, as emphasized by the Oppal Commission, the structural independence of the Commissioner - as an officer of the legislature who is independent from both stakeholders and from the Executive Branch of Government - is imperative in ensuring his effectiveness and legitimacy. Fourth, to the extent that the existing legislation bears certain earmarks that smack of the process being a criminal or quasi-criminal process (the reality, for example, that respondent officers cannot be

compelled under the *Police Act* to answer questions about what happened) the legislation must be reformed, as a "right to remain silent" is fundamentally opposed to the proper purposes of a regulatory discipline statute.

The White Paper and draft Statute, issued in March 2005, were informed by a painstaking review of all available written submissions that were made to the Special Committee of the Legislature in 2002, a review of the nearly 30 days of *Hansard* proceedings of that Committee which included feedback from persons ranging from professors to complainants, a review of the Special Committee's Reports, a consideration of all internal and external feedback the Commissioner received since becoming Commissioner, and of course his own experience in carrying out his mandate under the statute. The White paper was drafted so as to invite comment by stakeholders and informed persons, prior to the Commissioner issuing a final report to the Legislature.

In June 2005, the Commissioner issued a slightly revised version of his White Paper as an Adjunct to his Annual Report. He initially asked interested persons to respond by August 15, 2005, but as matters evolved the process unfolded over a considerably longer period of time, during which the Commissioner received written submissions and/or oral comments from 14 different responders, including police unions, police chiefs, lawyers for complainants, judges and former *Police Act* adjudicators, a tribal police board and the BC Civil Liberties Association.

By the time the Commissioner issued his final report – his Green Paper – on August 1, 2006 of this year, he also had the benefit of considering recent developments in Ontario arising from the *LeSage Report* in 2005, and developments in Alberta arising from its Discussion Paper on the Police Services Regulation. Even more importantly for this jurisdiction, he was by now conscious that his final Report would be issued in the context of a major audit report and recommendations regarding the BC process, being undertaken by Josiah Wood, Q.C., at the request of the Solicitor General a couple of months after the issuance of the White Paper. I expect that you will hear more from Mr. Begg about Mr. Wood's process, its genesis and its connection to future legislative reform of the BC *Police Act*. It will suffice to me to say that it appears that we are now much closer to

having *Police Act* reform on the legislative agenda than we were when this process started.

The White Paper and draft statute are lengthy documents; they are available on the Police Complaint Commissioner's website. I do not have time to detail the more than 70 recommendations made in those documents. I will suggest however that many of the recommendations touch on questions that will be of universal interest in the design of any well thought-out statute. I will address only four:

First, should police officers be under a statutory duty to cooperate with a complaint investigation, and should they be under compulsion to testify?

On this point, the White Paper states as follows (pp. 224-25):

> *Compellability*: Draft s. 40 would reform what I regard to be the very unsatisfactory provisions in s. 61.1 of the *Police Act* under which respondents may not be compelled to testify, but may be subject to an adverse inference for failing to do so. The Saanich Police Department fairly posed the question raised by this provision as follows in their submission to the Special Committee:
>
> > Can police truly be accountable, and can departments endeavour to correct behaviour, if a respondent is not bound to testify? Is the concern for the right against self-incrimination greater than the right of the public to have a transparent and accountable police department and greater than the right of the department to ensure that the problem behaviour is corrected?
>
> It is in my view inappropriate for respondent officers to be protected from the usual obligation to provide evidence in a regulatory discipline process. As made clear in the preamble to this White Paper, the police complaint process is not properly understood to be a quasi-criminal proceeding. It is an error to assume that respondents have, or that the process requires the respondent to have, the right to remain silent. The discipline process is a civil regulatory proceeding. As with other civil proceedings and modern regulatory statutes dealing with professional conduct, the obligation to respond promptly, fully and truthfully to allegations of misconduct is a legal and ethical duty properly attached to the privilege of being a professional. This is so especially for police officers, who have a choice whether to become police officers, and who have a special duty to the truth and to the rule of law. It is inappropriate for respondent police officers to be able to avoid the truth by standing behind a legally authorized wall of silence.
>
> It is no answer to assert that this would cause police to have "lesser rights" than the criminals they investigate. If a police officer is accused of a crime, the officer will have all the rights attendant on the criminal process. The police complaint process is not a criminal process, and so the proper comparison is not with criminals, but with other professionals who enjoy and protect the public trust.

> Professor Lustgarten has correctly noted that the requirement to tell the truth is a necessary incident to the acute public interest in the proper conduct of members of the police. The Australian Law Reform Commission has described the obligation to give evidence as "the perfectly natural consequence of membership in a disciplined force whose very duty is to uphold and enforce the law, if not of the quasi-employment relationship alone". Professor Stenning has concluded that constitutional and legal parameters in which to draft such reforms are "quite permissive".
>
> The very existence of the adverse inference that "may" be drawn in s. 61.1(1) of the present *Act* reflects the drafters' own ambivalence about using a quasi-criminal model in the complaint process. Unfortunately (but not surprisingly), the "adverse inference" has been an entirely unsatisfactory substitute for a duty to cooperate. The circumstances in which it is appropriate to draw an adverse inference are not clear. It is seldom used. But even where an adverse inference can properly be drawn, an adverse inference is a far cry from the accountability that would be gained from an officer's statement regarding what happened.
>
> The object of the complaints process, as with other civil or administrative processes, is to arrive at the truth and to deal with that truth in a statute designed to educate, correct and, where appropriate, to discipline. The wall of silence encouraged by s. 61.1 undermines that object. It is not unfair to require officers to tell the truth. Apart from serving the narrow self-interest of certain respondents whose interests might be incompatible with the truth, no valid rationale has been given to support it. The present section thus serves to create inefficiency and cost, and jeopardizes public confidence in the process. This is why, of all the reforms proposed in this paper, compellability is foundational.
>
> The compellability of respondents should of course be limited to its purpose, i.e., the police complaint process. Evidence adduced in discipline proceedings should not be admissible in other administrative, civil or criminal proceedings. For this reason, I have proposed in subsections (4) and (5) a strong "use immunity" that would supplement other existing legal protections for the same purpose, and thus ensure that that the testimony of officers in the discipline process is not used against them in other proceedings. [footnotes omitted]

Second, what rights of information and participation should complainants have in the discipline process and any ensuing public hearing?

My own research discloses that different jurisdictions address this question very differently. They range from Ontario and the RCMP process where complainants have the same rights as respondent officers, to other jurisdictions where the complainant has no role beyond the filing of the complaint. The British Columbia model seeks a middle ground, in which complainants have certain information rights during the complaint process, no participatory role at a discipline hearing before the police chief, and, if a public hearing is called, the right only to make oral or written submissions after the evidence is called. On this issue, the White Paper states as follows (pp. 22-23):

… I appreciate that informed observers have expressed support for granting complainants evidentiary rights at public hearings that are co-extensive with those of commission counsel and respondents. While I have accorded those views significant weight, I am inclined to Professor Hogarth's view, expressed at the Special Committee, that full evidentiary participation as of right would be undesirable. I have arrived at this conclusion for several reasons. First, the legislation properly confers on commissioner's counsel the role of making the case against the respondent. This difficult function requires careful preparation and strategic thinking regarding what evidence to tender, what facts to agree to, what witnesses to call and how to approach cross-examination. In purely functional terms, I am not persuaded that the automatic participation of complainants in the evidentiary phase of the public hearing process would improve public hearings in making the case or getting to the truth, particularly now that the role of commissioner's counsel is being clarified. Second, it is my frank view that the introduction of one or more complainants into this evidentiary process, some of whom will be represented and others of whom will not, runs a significant risk of undermining my counsel's ability to effectively exercise his difficult task, and depending on the conduct of certain complainants, may even impact on the procedural fairness of such hearings. Third, I have not been persuaded that the automatic and full participation of complainants is necessary from a rights perspective. Complainants and respondents at public hearings are not in equivalent positions. A public hearing is not a civil tort case. Nor is it a form of human rights hearing where the focus is on compensating the victim. A public hearing is a regulatory discipline hearing where the respondent's conduct is the focus, and where the respondent is the person in greatest jeopardy. Thus, while a respondent should be entitled to full procedural rights, the case for equal rights for complainants is not as clear in this process. Fourth, I do not believe that the full participation of complainants as of right accords with the regulatory / discipline model described in the preamble to this paper. The vast majority of professional regulatory proceedings limit their discipline hearings to the member and the "prosecuting" counsel. The role of complainants in public hearings is already greater than that they would enjoy in those other contexts. Fifth, regard must be had to the very practical reality that public hearings can be expensive and time-consuming. The introduction of one or more complainants into the public hearing process would add significantly to the already considerable time and expense involved in these proceedings. While I appreciate that this is the present situation under the *RCMP Act*, I am not convinced that adopting the *RCMP Act* public hearing experience would be a positive addition to the BC statute. Finally, it is important to be reminded that the hearings at issue are *public* hearings. The public nature of these hearings means that, subject to very limited exceptions, the public and media are able to attend and ensure that the process is accountable.

I wish to emphasize that all of the foregoing supports of my view that complainants should not enjoy an *automatic right of evidentiary participation*. First-party complainants would retain their existing right to make oral and written submissions after the evidence is called, a right I propose would be clarified to extend to making submissions on penalty, and all of which would also be made available to third party complainants in appropriate circumstances: see draft s. 20. In addition, I propose to add a new provision, which would respond to the Special Committee's recommendation on this point and expressly extend the potential participation of complainants by allowing complainants to participate in the evidentiary process if a public hearing Adjudicator determines that such participation is necessary to ascertain the truth. Under this proposed reform, a complainant who can persuade the Adjudicator that their participation in the

> evidentiary phase is necessary would have those evidentiary rights the Adjudicator considers to be necessary and appropriate in the circumstances. [footnotes omitted]

Third, should the civilian oversight body have the power to independently investigate complaints, and if so should that role be exercised as a matter of course in certain classes of cases, or only in special circumstances?

It will be recalled that Justice Oppal recommended that such a power exist but that it be used only in exceptional circumstances. It will further be recalled that the drafters of the *Police Act* decided not to accept this recommendation, opting instead for a model that entrusts the investigation function presumptively to the home department, gives the commissioner discretion to refer the investigation to an outside force in special circumstances, and finally authorizes the commissioner to order a public hearing for reasons that include an inadequate investigation.

In the White Paper, the Commissioner noted that he was in general pleased with the quality of the external investigations he ordered, and suggested that an independent investigation power would not be necessary if the Act was amended to include a formal duty on police officers to cooperate, together with a duty on external forces to conduct external investigations when ordered. However, by the time the Green Paper was issued in August of this year, the Commissioner expressed a different view on the matter (p. 15)

> The question whether the Police Complaint Commissioner should have the independent power to investigate complaints has been a significant and controversial issue ever since the Oppal Report. The *Oppal Report* in fact recommended such a power in 1994, but it was excluded when the *Act* was passed in 1998 in favour of the Commissioner's power to order police to conduct new investigations or external investigations.
>
> I reconsidered this question in my *White Paper*, and concluded that my office does not require an independent power to investigate <u>if</u> the following other legislative amendments are made (a) the enactment of a statutory power to compel officers to give evidence, and a statutory duty to cooperate, and (b) clear legislative direction that external investigation orders must be complied with.
>
> Saanich and the Police Chiefs oppose my office having independent power to investigate complaints. Saanich states that such a power would damage the public's confidence in police. The Police Chiefs also oppose such a power, and even go so far as to oppose Commission Counsel being allowed to conduct investigations in order to properly prepare for a public hearing. The Police Chiefs state: "We suggest the legislature be wary of the inadvertent creation of a quasi-investigational body in the OPCC…. Such a shift in philosophy, it is submitted, requires a much broader public policy debate".

> As to the latter point, the public policy debate is now well underway. The question is the right course of action on this point.
>
> The BC Civil Liberties Association, and individual advocates, have taken the position that a "home force" should never be allowed to investigate police misconduct, particularly in cases involving deaths or critical injuries involving a member of that force. BC Civil Liberties Association argues that: "In the case of death or serious injury of a civilian in police custody, we believe that there should always be an independent civilian led investigation". BC Civil Liberties also argues that the PCC should have the discretion to independently investigate a matter where he considers there is good reason to do so. BCCLA argues that an independent investigation power would (1) increase public confidence in the complaint process, (2) act as an incentive to police to be thorough in their internal investigations, (3) act as a safeguard where both an internal and external investigation are unsatisfactory, (4) increase the confidence of complaints in making complaints, and (5) provide a power that is not dependent on the personalities of the particular individuals who happen to run internal investigation departments.
>
> There is much force to the argument that the time has now come for death and serious injury cases to be investigated by an agency other than the home police force.
>
> Who the investigator ought to be is a more difficult question. One option is an external force. A second is my office. A third is a specialized unit of officers, integrated from among municipal police forces and the RCMP, and dedicated to independent *Police Act* investigations, with appropriate protocols governing the exclusion of those members out of whose home force an incident arises. The legislation could easily be crafted to make such a unit automatically responsible for investigations in relation to deaths and critical injuries, and subject to being activated in other cases pursuant to an order of the Commissioner.
>
> As stated in my *White Paper*, I have been pleased with the quality of the investigative work undertaken to date where I have ordered external investigations. However, I have also recognized the hardship of personnel and finances that some individual departments experience when external investigations are ordered. A specialized and integrated unit of police officers, whose creation would involve specially trained team at arm's length from any particular home force, and a measure of cost-sharing and contribution by the province, has much to commend it both in principle and in practice.
>
> If the creation of such a unit is not deemed practicable, the responsibility should fall upon my office, in a fashion akin what has been proposed for Ontario under Bill 103, which was drafted as a result of the *LeSage Report* (April 2005). Consistent with that responsibility, provisions will have be added to the statute ensuring that the Commissioner is in a position to retain a proper team of investigators, and is armed with necessary investigative powers. [footnotes omitted]

Fourth, should a formal public hearing be the only means of challenging a discipline decision rendered by a police chief which decision the PCC believes is unsatisfactory?

The Green Paper addresses this issue as follows:

The BC Civil Liberties Association has made the following submission:

> In the almost eight years since the creation of the current Part 9 of the *Police Act* governing the police complaint process, there have been approximately 12 public hearings ordered by the Commissioner. If the BCCLA had been asked in 1998 whether we would be satisfied with twelve public hearings in eight years, we would have responded with an emphatic "no".
>
> Public hearings have become complicated, time-consuming and expensive procedures. Unsurprisingly, respondent officers are almost always represented by legal counsel, a right the BCCLA would argue to protect. The Commissioner is unlikely to order a public hearing in the public interest except in only the most serious of allegations of misconduct due to the cost and time required to undertake a public hearing. Yet, he may believe the Discipline Authority has erred with respect to the conclusion regarding conduct or in the sanctions imposed against an officer who has committed misconduct.
>
> The BCCLA does not perceive a simply remedy to make public hearings more efficient, less time consuming and inexpensive. Partly due to their very public nature and the degree of media attention these hearings attract, we would expect them to continue to be expensive and time consuming.
>
> Instead, we believe that the Commissioner should have a new authority to substitute his own decision for a decision of a Discipline Authority both with respect to a conclusion as to whether an officer has breached professional standards and the appropriateness or the discipline/corrective measures. Such authority should only be exercised where a public hearing is not appropriate in the circumstances and:
>
> (a) the Discipline Authority's decision with respect to conduct or discipline/corrective measures is not reasonable based on the evidence in the record after a satisfactory investigation and that a substituted decision is in the public interest, or
>
> (b) the Discipline Authority has made an error with respect to the proper interpretation of the *Code of Professional Conduct* or other regulation or guideline.

There is considerable merit to the view that a civilian overseer ought to be able to independently review – on application by a complainant or respondent, or on the Commissioner's motion - a Discipline Authority's findings and decision where a public hearing is not otherwise in the public interest, but the decision is otherwise unsatisfactory and should be reviewed. I would, however, make that power subject to four provisos.

First, I believe that the decision-maker ought to be an adjudicator rather than the Commissioner. Vesting such authority in an adjudicator is more consistent with the existing model, and prevents the complication that would inevitably arise if a formal adjudicative mandate were added to my role.

Second, where the Commissioner believes that a public hearing is not appropriate but there is good cause for an adjudicator to review a discipline authority's decision, the review would be limited to a review of the record that was before the discipline authority. Thus, review would be more in the nature of an appeal rather than the more fulsome "de novo" or "sui generis" review involved in the public hearing.

> Third, any such power must be limited to its purpose, and must not be allowed to usurp the public hearing function. I therefore suggest that this power categorically exclude any case involving police conduct leading to the death or critical injury of a person, or any case where the Commissioner would seek dismissal if the matter proceeded to public hearing. The public hearing would continue to be the only forum for the review of those discipline decisions.
>
> Finally, even for these less serious cases, the Commission would retain the general discretion to refer the matter to a public hearing if that were necessary in the public interest.
>
> This proposal would respect the public hearing process, while going a long way to ensuring more effective civilian scrutiny of a wider range of discipline decisions.

Conclusion

I conclude by noting that in 2001, Professor Samuel Walker wrote a wonderful and insightful little book entitled *Police Accountability: The Role of Civilian Oversight*. The book is excellent because of its helpful summary of the history of civilian oversight in North America and England, and its compendious reference to supporting source material. It is insightful because it cautions those assessing civilian oversight systems not to expect the wrong things from those systems or from legislative reform initiatives. Walker argues that the most effective civilian oversight systems are **not** those that focus on achieving an increase, for its own sake, in the statistical sustain rate of complaints. The best systems in Walker's view are those that focus on getting the right complaints sustained. And he argues that while complaint systems need to be able to effectively target and identify officer misconduct, that reactive role is not a sufficient mark of an effective oversight system. By far the most effective systems are those that go beyond that objective to actively monitor organizational behavior and help achieve organizational change, so as to reduce misconduct and future lack of accountability. To achieve those latter goals requires subtle thinking, and clear legislation designed to express it. I believe Mr. Ryneveld has performed a considerable public service in having engaged in and encouraged such thinking about civilian oversight in British Columbia. One hopes this thinking will find resonance with legislators.

Thank you for your time.

***