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September 28, 2018

Jay Chalke, Ombudsperson  
Office of the Ombudsperson  
Second Floor, 947 Fort Street  
Victoria, B.C. Canada  
Letter sent via email to mail@ombudsperson.ca

Regarding: an act or omission constituting an offence under an Act of the Legislature or the Parliament of Canada, or a regulation made under an Act; BC Ministry of Labour and Citizens' Services (BCMLCS), BC Statistics false reporting; dismissal for insubordination; unfair administrative decisions or actions; lack of adequate reasons; unfair procedures; and arbitrary unauthorised procedures; request correct methods and data to accompany the findings; formal policies, clear accountabilities and clear steps to safeguard integrity of information used for public services provision

Dear Mr. Chalke,

I write to you again (letters dated April 11, 2018, May 21, 2018, September 14, 2018), given the Office of the Ombudsperson's role to "promote and foster fairness and accountability in public administration" and to "seek resolutions that are principled and practical".<sup>1</sup>

Also, I have posted above mentioned letters with attached supporting documents (17 pages) for your convenience at [wminfomatics.com/WP/index2.html](http://wminfomatics.com/WP/index2.html) as it appears these were not read or understood.

A statistical office plays a fundamentally important role in developing and guiding public services delivery responsive to changing public requirements. For example, providing statistical information on the changing demographics occurring in communities across British Columbia – changes in fertility, life expectancy, in and out migration by age and sex to the local level. As mentioned previously, I served the public as the Provincial Government of British Columbia's ranking expert on migration.

### **To be an expert or not to be an expert**

Thank you for having an Ombudsperson Officer (Nathan Paul, July 30, 2018) explain why my requests for a "**Resolution: clear steps to safeguard integrity; scientific method**" stated in my April 11, 2018 letter:

"The resolution proposed here is to require reports, provided to or created by public service providers in British Columbia from the provincial to the municipal and regional levels, reports referred to when considering public service delivery must include the correct methods and data to accompany the findings, rather than incorrect methods and data to accompany unfounded, unsubstantiated numbers."

would not be recommended to the appropriate Provincial Government of British Columbia officials. Unfortunately, the 'reasons' set out by N. Paul, in his preliminary review were unsound and avoided addressing the main issues I described in my above-mentioned letters. Please allow me to explain.

First though, I would like to thank N. Paul (and your Office staff – Ombudsperson Office) for their honesty by recognizing:

"... our office does not possess expertise in the methodological debates in your field ...." (July 30, 2018, Letter)

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<sup>1</sup> <https://www.bcombudsperson.ca/about/our-vision-mandate-and-principles>

This recognition is appreciated because it is truthful (even though it is used to dismiss my request that correct method and data should accompany ‘findings’). It is appreciated because pretending to have expertise in statistical methods when one does not, would be wrong - an attempt to deceive, just as pretending to use statistical methods when one does not use statistical methods would also be wrong - an attempt to deceive.

However, N. Paul’s statement avoids the main issue, namely false information being disseminated by the Provincial Government of British Columbia’s Official Statistical Agency, BC Statistic of the Ministry of Labour and Citizens’ Services (now found within the Ministry of Jobs, Trade and Technology). BC Statistics officials (named in previous letters) pretended to use statistical methods when they were not using statistical methods - an attempt to deceive, in contravention of Canada’s Criminal Code and the Statistics Act.<sup>2</sup>

### **Non-statistical methods**

The evidence found in government documents<sup>3</sup> that proves BC Statistics officials deceived Statistics and Finance Canada as well as the citizens of British Columbia, was clearly presented in my previous letters but ignored by N. Paul.

A government/tax funded statistical office should not use just any method to come up with numbers. For example, a government/tax funded statistical office should not use non-statistical methods such as a crystal ball, or tarot cards or other divinatory practices, or just make up numbers to make the current government look good. Such methods would be used without deception if a government/tax funded office were called BC Crystal Balls, or BC Tarot Cards, or BC Divine Authority, or BC Looking Good, or BC Non-Statistics, or some such titles.

Your office’s dismissal of my aforementioned request on the grounds that any methods, even non-statistical methods (even deception), are acceptable, means that unsubstantiated numbers – false information, can be used guide public services provision. False information would not facilitate the provision of service to the public in a manner that is responsive to changing public requirements and is therefore contrary to the BC Public Service Act Section 2 a)

“Purposes of Act- to facilitate the provision of service to the public in a manner that is responsive to changing public requirements”

False, unsupported / non-statistical information can result in poor provision of services, while reliable information supported by evidence (rather than made up numbers) can result in the provision of services in a manner that is responsive to changing public requirements.

### **Substandard statistical methods:**

While the main issue is that BC Statistics officials deceived Statistics and Finance Canada regarding a study into methods and data to refine the Equalization Payments Programme (a multi-billion dollar programme annually), as well as deceiving citizens addressing public school closures, and the public in general, (non-statistical methods - absent of supporting methods and data), “substandard” methods and data also resulted in unreliable information being used to guide public service delivery.

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<sup>2</sup> Sections 366 and 380, Justice Laws Website, Government of Canada, <http://laws-lois.justice.gc.ca/eng/acts/C-46/section-366.html>, Justice Laws Website, Government of Canada, <http://laws-lois.justice.gc.ca/eng/acts/C-46/section-380.html>; Section 31 b), Statistics Act R.S.C., 1985, c. S-19, <http://laws-lois.justice.gc.ca/eng/acts/S-19/FullText.html>

<sup>3</sup> "The Equalization Program and the Property Tax Base: Feasibility Study Conducted by Statistics Canada", Statistics Canada, February 28, 2005, p. 63, as well as "GENERALIZATION ESTIMATION SYSTEM (GES) Small Area Population Estimation, Method and Error Evaluation", BC Stats, August 2011, (GES 2011) P. 8

In order to follow statistical methods and practices, as is befitting a government/tax funded statistical office, statistical methods and reliable data would be open to external peer review. Changes in methods and or data would be tested, open to external review, and if adopted, would accompany findings rather than adopted but not open for review, and not published.

For example, the Ombudsperson's Office is required to publish relevant information annually.<sup>4</sup> A similar requirement could also be applied to BC Statistics. BC Statistics would be required to publish the real methods and data used to calculate "findings". Formal policies and assigned clear accountabilities could help safeguard the integrity of analytic products.<sup>5</sup>

### **Retaliation for raising concerns about non-statistical, substandard practices**

Ombudsperson Officer, N. Paul, states my case was ruled upon by the BC Labour Relations Board and legitimately dismissed. This also is misleading. It suggests that my case was heard by the LRB. It was not. The LRB ruled on whether the arbiter's decision to block a fair hearing was acceptable. I would like to make clear the fact that an arbiter, Vince Ready, was asked by the BCMLCS to block arbitration (a fair hearing into the real matters in dispute) on the grounds that I went down the wrong channel by contacting the Deputy Minister to let him know that I did not agree with the dismissal for insubordination.

Even though I explained to the LRB (overseen by the same Ministry, the Ministry of Labour and Citizens' Services, that fired me) that I had informed the Deputy Minister because that was what I thought I was supposed to do, as per Master Agreements Article 8.9 Dismissal or Suspension Grievances

"(a) In the case of a dispute arising from an employee's dismissal, ... the grievance may be filed directly at arbitration, with a copy to the BC Public Service Agency and the **Deputy Minister** of the appropriate Ministry, within 30 days of the date on which the dismissal, rejection on probation, or suspension occurred, or within 30 days of the employee receiving such notice."

the LRB simply agreed with Mr. Ready; therefore, I was denied a fair hearing into the real matters in dispute, namely the real methods and data used to create population estimates and forecasts.

Also, N. Paul, makes an unsubstantiated claim that:

"BC Stats ... refuted your assertions both during your employment and after your termination."

Really? Please provide these refutations. The last correspondence with BC Stats I received supported my assertions. Also, please read the correspondence from BC Stats after I was fired found in the summary of my presentation "Population Projections for Community Members"<sup>6</sup> at the 2013 Congress organized by the Federation of Humanities and Social Sciences Methods for Projections session hosted by the Canadian Population Society as this shows the last correspondence I received from then BC Statistics' Executive Director, A. Cocco. In no way can this be seen as a refutation of my "assertions"; instead, the evidence provided in my presentation clearly proves that BC Stats deceived Statistics Canada and Finance Canada as well as citizens of British Columbia.

Mr. Chalke, it appears as though the Ombudsperson's Office accepts the statement by BC Statistics officials, even though the evidence shows that BC Statistics officials are guilty of deception / false

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<sup>4</sup> BILL M 207 – 2015 WHISTLEBLOWERS PROTECTION ACT, 2015 Part Two – Procedures for Making a Disclosure, <http://www.bclaws.ca/civix/document/id/bills/billsprevious/4th40th:m207-1#section6>

<sup>5</sup> As described in "Analytic Activities at Statistics Canada" submitted by Statistics Canada, prepared by Chief Statistician, Ivan Fellegi, 1999.", Conference of European Statisticians, 47th plenary session, page 7.

<sup>6</sup> [http://wminfomatics.com/PopulationProjections/CPS\\_PPP\\_Validate.pdf](http://wminfomatics.com/PopulationProjections/CPS_PPP_Validate.pdf)

reporting, while the Ombudsperson's Office dismisses the statement by a former employee who provided the evidence of the false reporting. Obviously, there is something very wrong, not only with BC Statistics practices but with the BC Ombudsperson's Office decision.

Also, Ombudsperson's Office does not recognize that an individual employee who raises concerns about non-statistical and substandard methods, data and practices deceiving citizens and federal government officials (wrongdoing) who then is accused of making a co-worker feel unsafe, then denied mediation / resolution, required to have an assessment of a "believed" "behavioural problem" can legitimately be considered a 'whistleblower' who was the target of retaliation.<sup>7</sup>

### **The culture has to change to one that focuses on results for people**<sup>8</sup>

Please understand I ask for:

1. the implementation of formal policies, clear accountabilities, and clear steps to safeguard the integrity of information used for public services, referring to scientific / statistical methods, data and practices, including ensuring correct methods and data accompany findings, and /or
2. the removal of the block to a fair hearing into the real matters in dispute

to help ensure reliable information, with well grounded, supported 'findings', is used to facilitate the provision of service to the public in a manner that is responsive to changing public requirements, such as statistical information on the changing demographics occurring in communities across British Columbia – changes in fertility, life expectancy, in and out migration by age and sex.<sup>9</sup>

Cordially,



William Warren Munroe

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<sup>7</sup> WHISTLEBLOWERS PROTECTION ACT, 2015,  
[www.bclaws.ca/civix/document/id/bills/billsprevious/4th40th:m207-1#section6](http://www.bclaws.ca/civix/document/id/bills/billsprevious/4th40th:m207-1#section6)

<sup>8</sup> the wording here is drawn from Auditor-General Michael Ferguson's 2018 Spring Reports, Incomprehensible failures,  
[http://www.oag-bvg.gc.ca/internet/English/parl\\_oag\\_201805\\_00\\_e\\_43032.html](http://www.oag-bvg.gc.ca/internet/English/parl_oag_201805_00_e_43032.html)

<sup>9</sup> The National Post published an article titled "[Canada's Latest Baby Boom Caught Experts by surprise](#)" in early July 2014, several years after I wrote an article "[School Age Population Change in BC and Canada, 1971 to 2007](#)" (May 15, 2008) wherein I stated "Nonetheless, at the provincial level, the number of children entering elementary school should begin to increase slowly over the next few years.