



**CIPP  
IPPM**

Civic Institute of  
Professional Personnel

L'Institut professionnel  
du personnel municipal

September 12, 2022

BY E-MAIL

Mr. David Patacairk  
Legal Counsel  
City of Ottawa  
110 Laurier Avenue West, 3<sup>rd</sup> Floor  
Ottawa, Ontario, K1P 1J1

Dear Mr. Patacairk:

**Re: Policy Grievance of CIPP – Employment Benefits for CIPP members beyond the age of 65**

This letter constitutes a policy grievance by the Civic Institute of Professional Personnel (“CIPP”) which is submitted at Step 2 of the grievance procedure pursuant to Article 19 of the Collective Agreement. CIPP reserves the right to amend this grievance.

CIPP is filing this policy grievance as a result of concerns over the reduction of Employment Benefits for members beyond the age of 65. Although Article 21.10 provides for the reduction of benefits for employees working beyond age 65, the Employer’s application of the Article is an unreasonable exercise of management rights (Article 3), and contrary to Article 5 (No discrimination). Moreover, Article 21.10 and the Employer’s application thereof is contrary to the Ontario *Human Rights Code*, and the *Canadian Charter of Rights and Freedoms*.

The grievance therefore arises as a result of:

- 1) The employer’s violation of Article 3 – Management Rights & Article 5 – No discrimination, of the Collective Agreement;
- 2) The employer’s violation of its obligations under the Ontario *Human Rights Code* and the *Canadian Charter of Rights and Freedoms*; &
- 3) The employer’s violation of any other relevant articles of the collective agreement, relevant employer’s policies and guidelines, and relevant legislation.

Therefore, CIPP is seeking full redress for its members who have been adversely affected. This includes, but is not limited to, a declaration that the Employer violated the collective agreement and applicable legislation, the provision of appropriate and equivalent levels of Health and Welfare Benefits for all CIPP members regardless of age, compensation for any additional expenses incurred, and any other remedies deemed fair and reasonable by an Arbitrator.

Yours truly,

A handwritten signature in blue ink, appearing to read "P. Bleyer". The signature is fluid and cursive, with the first name "P." and the last name "Bleyer" clearly distinguishable.

Peter Bleyer  
Executive Director  
Civic Institute of Professional Personnel